

EPA REGISTRATION NUMBER 83100-28 – VOL. 1


 United States
 Environmental Protection Agency

 Office of Pesticide Programs (7505C)
 Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

83100-28

21B

6.2

Distributor Company Number

83979

Note: Do not submit distributor product labels

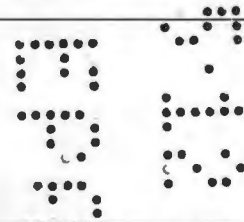
Name of Registered Product (basic product name accepted by EPA)

ROTAM Methomul 90SP Insecticide

Distributor Product Name

NUDRIN SP Insecticide

Name and Address of Distributor (Type; include ZIP code)

 ROTAM NORTHAMERICA, INC.
 1400 NW 107th Avenue
 Suite 310
 Miami, FL 33172

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

[Signature] / Agent

Date

05/10/11

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

[Signature] / Agent

Date

05/10/11

Material to be added to an e-Jacket/Jacket

Reg. # 83100-28

Decision # 439798

Description: initial registration

1. Placement within the e-Jacket/jacket:

☒ Default: (chronological, top = newest)

☐ File Location: (eg. "before page 45 in .pdf")

2. ☒ Send to Data Extraction contractors this material:

☒ Newly stamped accepted label

☐ Notification

☒ New CSF

☐ Other: _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).


Reviewer: Tom Harris

Phone: 308-9423

Division: RD

Date: 4/5/11



reg notices: methomyl 83100-27, 83100-28 

Thomas Harris o Frank Sobotka

04/05/2011 05:11 PM

Dr. Sobotka,

Attached please find the registration notice and stamped labels for two Rotam methomyl end-use products. Thanks for your assistance in providing information as needed and revising the labels in a timely manner. I'll send the reviews in a separate email tomorrow; I'm still waiting for a copy of one review.

83100-27



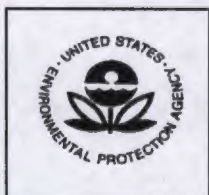
083100-0027.20110405.reg notice stamped label.ac.ocr.pdf

83100-28



083100-0028.20110405.reg notice stamped label.ac.ocr.pdf

Tom Harris
EPA/OCSP/OPP/RD/IRB
voice: (703) 308-9423
fax: (703) 308-0029
harris.thomas@epa.gov
visit <http://www.epa.gov/pesticides>



**U.S. ENVIRONMENTAL PROTECTION
AGENCY**

**Office of Pesticide Programs
Registration Division (7505C)
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, D.C. 20460**

EPA Reg.
Number:

83100-28

Date of Issuance:

April 5, 2011

Date of Expiration:

Term of Issuance:

conditional

Name of Pesticide Product:

Rotam Methomyl 90SP
Insecticide

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration
(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Rotam Agrochemical Company, Ltd.
c/o IPM Resources LLC (agent)
4032 Crockers Lake Blvd., Suite 818
Sarasota, FL 34238

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
2. Make the following label changes before you release the product for shipment:
 - a. Add the phrase "EPA Registration Number 83100-28".
3. Per the indicated EPA Guidelines, submit the following within the months indicated as measured from the effective date of this registration.
 - a. One year storage stability (830.6317) (measurements at 0, 3, 6, 9, and 12 months).
Submit in both electronic and hard copy format. Due within 18 months.
 - b. Corrosion characteristics (830.6320) (measurements at 0, 3, 6, 9, and 12 months).
Submit in both electronic and hard copy format. Due within 18 months.
4. Submit two (2) copies of the final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A copy of the label stamped "accepted with comments" is enclosed for your records. If you have any questions, please contact Tom Harris at (703) 308-9423 or harris.thomas@epa.gov.
enclosure

Signature of Approving Official:

Thomas C. Harris
Insecticide Rodenticide Branch
Registration Division (7505P)

Date:

APR - 5 2011

RESTRICTED USE PESTICIDE

Due to High Acute Toxicity to Humans

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

GROUP

1A

INSECTICIDE

Rotam Methomyl 90SP Insecticide *In Water Soluble Packets*

Active Ingredient	By Weight
Methomyl	
(S-methyl-N-[(methylcarbamoyl)oxy]thioacetimidate)	90%
Other Ingredients	10%
TOTAL	100%

EPA Reg. No. 83100 - 28

EPA Est. No.: 69821-CHN-005

KEEP OUT OF REACH OF CHILDREN

DANGER

POISON



PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See additional Precautionary Statements on inside booklet and back panel of container and Directions for Use on inside booklet.

Manufactured by:
Rotam Agrochemical Company Ltd.
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong
1-866-927-6826

ACCEPTED
With COMMENTS
In EPA Letter Dated:
APR - 5 2011

Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:

83100-28

Net Contents:
Packets/Container
TBA

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Refer to inside label booklet for additional precautionary information including Personal Protective Equipment (PPE), User Safety Recommendations, Engineering Controls Statements, Environmental Hazards and Directions For Use.

FIRST AID

(N-Methyl Carbamate insecticide)

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

ATROPINE IS AN ANTIDOTE --SEEK MEDICAL ATTENTION AT ONCE IN ALL CASES OF SUSPECTED POISONING.

If poisoning symptoms appear (see POISONING SYMPTOMS), get medical attention.

POISONING SYMPTOMS — Methomyl poisoning produces effects associated with anticholinesterase activity which may include weakness, blurred vision, headache, nausea, abdominal cramps, discomfort in the chest, constriction of pupils, sweating, slow pulse, muscle tremors. If poisoning symptoms appear, refer to First Aid section and seek medical attention at once.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

TREATMENT — Atropine sulfate should be used for treatment. Administer repeated doses, 1.2 to 2.0 mg. intravenously every 10 to 30 minutes until full atropinization is achieved. Maintain atropinization until the patient recovers. Artificial respiration or oxygen may be necessary. Allow no further exposure to any cholinesterase inhibitor until recovery is assured.

Do not use 2-PAM for exposure to ROTAM METHOMYL 90SP alone. However, for exposure to combinations of ROTAM METHOMYL 90SP and organophosphorous insecticides, 2-PAM may be used as required to supplement the atropine sulfate treatment. Do not use morphine.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

You may also contact the National Poison Control Center 24-hr Emergency Hotline at: 1-800-222-1222.

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS
AND DOMESTIC ANIMALS
KEEP OUT OF REACH OF CHILDREN

DANGER

POISON



PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

Restricted Use Pesticide due to toxicity categories. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

Fatal if swallowed. May be fatal if inhaled or gets in eyes. Do not breathe dust. Do not get in eyes. Avoid contact with clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, loaders, applicators, cleaners, repairers of application equipment, and others exposed to the concentrate must wear:

- Long sleeve shirt and long pants.
- Chemical-resistant gloves, such as barrier laminate or butyl rubber.
- Socks and chemical resistant footwear.
- Protective eyewear.
- Chemical resistant apron.
- Respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or a canister with any R, P, or HE prefilter.

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROL STATEMENTS

Human fladders must be in enclosed cabs.

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR part 170.240 (d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

The enclosed cabs must be used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR part 170.240 (d)(4-6)]. The handler PPE requirements may be reduced or modified as specified in the WPS.

Water soluble packets when used correctly qualify as a closed loading system under the WPS. Handlers handling this product while it is enclosed in intact water-soluble packets are permitted

to wear long-sleeved shirt, long pants, shoes plus socks, chemical-resistant gloves, and chemical-resistant apron, provided the other required PPE is immediately available in case the bag is opened.

Pilots must not assist in the mixing and loading operations.

USER SAFETY RECOMMENDATIONS

USERS SHOULD:

- Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove personal protective equipment immediately after handling this product.
- Wash the outside of gloves before removing.
- As soon as possible, wash thoroughly and change into clean clothing.
- Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, and mammals. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high-water mark. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area. This chemical is known to leach through soil into groundwater under certain conditions as a result of label use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

This chemical can contaminate surface water through spray drift. Under some conditions, it may also have a high potential for runoff into surface water for several days to weeks after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, and areas overlaying extremely shallow groundwater, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas over-laying tile drainage systems that drain to surface water.

PHYSICAL AND CHEMICAL HAZARDS

Keep container closed. Use with adequate ventilation.

Directions For Use
 Agricultural Use Requirements
General Information
 Scouting
 Insect Predators
 Resistance
 Compatibility
Integrated Pest Management
Spray Preparation
Application
Spray Drift Management
Crop and Rate Tables
Storage and Disposal
Notice of Warranty

DIRECTIONS FOR USE

Restricted Use Pesticide

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI). REI Summary: REI peaches = 4 day; REI apple, cotton, grapefruit, lemon, nectarine, orange, tangelo, tangerine = 3 day; all other WPS uses = 48 hour REI.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical Resistant Gloves Category A (such as butyl rubber, natural rubber, neoprene rubber or nitrile rubber), all >14 mils
- Shoes plus socks
- Protective eyewear

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

Do not formulate this product into other End-use products without written permission from Rotam.

Do not apply thru Drip Chemigation unless accompanied by Rotam Supplemental Labeling.

ROTAM METHOMYL 90SP insecticide should be used only in accordance with directions for use on this label or in separate Rotam supplemental labeling. Rotam will not be responsible for use of the product in a manner not specified by Rotam in the product's labeling and User assumes all risk for such use.

ROTAM METHOMYL 90SP is a dry powder to be dissolved in water for application by mechanical ground, overhead sprinkler, or aerial application Hand-

held equipment is prohibited for application to crops.

Do not apply by ground equipment within 25 feet, or by air within 100 feet of lakes, reservoirs, rivers, estuaries, commercial fish ponds and natural, permanent streams, marshes or natural, permanent ponds. Increase the buffer zone to 450 feet from the above aquatic areas when ultra low volume application is made.

Pilots must not assist in the mixing and loading operations.

Use only in commercial and farm plantings. Not for use in home plantings. Not for use during any period after a commercial crop site is opened for public entry as a "U-Pick", "Pick Your Own" or similar operation; in no case shall preharvest applications be made after first public entry. The restricted entry interval and preharvest interval for the crop stated elsewhere on this label must be followed.

RESISTANCE MANAGEMENT

For resistance management, ROTAM METHOMYL 90SP insecticide is a group 1A insecticide. Repeated and exclusive use of ROTAM METHOMYL 90SP or other group 1A insecticides may lead to the build-up of resistant strains of insects in some crops. Not all members of this group have been shown to be cross-resistant. Different resistance mechanisms that are not linked to target site of action, such as enhanced metabolism, are common for this group of chemicals. Alternation of compounds from different sub-groups within this group may be an acceptable part of an integrated pest management program.

Some insects are known to develop resistance to products used repeatedly for control. When this occurs, the recommended dosages fail to suppress the pest population below the economic threshold. Because the development of resistance cannot be predicted, the use of this product should conform to resistance management strategies established for the use area. These strategies may include incorporation of cultural and biological control practices, alternation of active classes of insecticides on succeeding generations and targeting the most susceptible life stage. Consult your local or state agricultural authorities for details.

If resistance to this product develops in your area, this product, or other products with a similar mode of action, may not provide adequate control. If poor performance cannot be attributed to improper application or extreme weather conditions, a resistant strain of insect may be present. If you experience difficulty with control and resistance is a reasonable cause, immediately consult your local company representative or agricultural advisor for the best alternative method of control for your area. For additional information on insect resistance monitoring, visit the Insecticide Resistance Action Committee (IRAC) on the web at <http://www.irac-online.org>.

INTEGRATED PEST MANAGEMENT

This product should be used as part of an Integrated Pest Management (IPM) program which can include biological, cultural, and genetic practices aimed at preventing economic pest damage. Application of this product should be based on IPM principles and practices including field scouting or other detection methods, correct target pest identification, population monitoring, and treating when target pest populations reach locally determined action thresholds. Consult your state cooperative extension service, professional consultants or other qualified authorities to determine appropriate action treatment threshold levels for treating specific pest/crop systems in your area.

SCOUTING

Monitor insect populations to determine whether or not there is a need for application of ROTAM METHOMYL 90SP based on locally determined economic thresholds. More than one treatment of ROTAM METHOMYL 90SP may be required to control a population of pests.

BENEFICIAL ANTHROPODS

ROTAM METHOMYL 90SP at rates of 1/8 to 1/4 lb. per acre helps conserve certain beneficials, including big-eyed bugs, damsel bugs, flower bugs and spiders in cotton and soybeans. While these beneficials cannot be relied upon to control pests, they are of potential value and should be monitored along with pests in pest management programs on these crops.

SPRAY PREPARATION

Spray equipment must be clean and free of previous pesticide deposits before applying ROTAM METHOMYL 90SP.

Fill spray tank 1/4 to 1/2 full of water. Add ROTAM METHOMYL 90SP directly to spray tank. Carefully open the outer barrier bag containing ROTAM METHOMYL 90SP in a water soluble bag. Do not cut open the outer barrier bag. Invert the outer barrier bag allowing the inner water soluble bag to fall directly into the spray tank. Do not allow packets to become wet prior to adding to the spray tank. Do not handle, open, rip, tear, cut or perforate the inner water soluble bag. Mix thoroughly to fully dissolve the insecticide; once dissolved continued agitation is not required. Use mechanical or hydraulic means; do not use air agitation. Be sure the soluble packet is completely dissolved before adding any other ingredients. Spray mix should not be stored overnight in spray tank.

Compatibility: Since formulations may be changed and new ones introduced, it is recommended that users premix a small quantity of a desired tank mix and observe for possible adverse changes (settling out, flocculation, etc.). Avoid mixtures of several materials and very concentrated spray mixtures.

Do not use ROTAM METHOMYL 90SP with Bordeaux mixture (copper sulfate and hydrated lime), "Du Ter" (triphenyltin hydroxide), lime sulfur, "Rayplex" iron nor in highly alkaline solutions. Use mildly alkaline mixtures immediately after mixing to prevent loss of insecticidal activity.

Tank-mix solutions containing Boron may affect solubility of the water soluble film. When using Boron containing solutions in a tank-mix, follow these procedures:

- Add the correct amount of ROTAM METHOMYL 90SP water soluble packets first
- Be sure the soluble packets are completely dissolved
- Introduce Boron containing solutions last

If the above procedure cannot be followed, and Boron is an essential part of the spray mix, substitute ROTAM METHOMYL 29LV formulation for the water soluble packets.

Tank Mix Sequence: Add different formulation types in the sequence indicated below. Allow time for complete mixing and dispersion after addition of each product.

1. ROTAM METHOMYL 90SP and other products in water soluble bags.
2. Water dispersible granules
3. Wettable powders
4. Water based suspension concentrates
5. Water soluble concentrates

6. Oil based suspension concentrates
7. Emulsifiable concentrates
8. Adjuvants, surfactants, oils
9. Soluble fertilizers
10. Drift retardants

Follow local practice and manufacturer's recommendation.

APPLICATION

Apply at the recommended rates when insect populations reach locally determined economic thresholds. Consult the cooperative extension service, professional consultants or other qualified authorities to determine appropriate threshold levels for treatment in your area.

Follow-up treatments of ROTAM METHOMYL 90SP should be applied, as needed, to keep pest populations within threshold limits. On most crops, ROTAM METHOMYL 90SP should be applied at 5 to 7 day intervals to maintain control. Refer to crop specific directions for use in the crop tables for more specific information on treatment intervals.

Use sufficient water to obtain thorough, uniform coverage. Since ROTAM METHOMYL 90SP is a fast acting contact insecticide, best results follow direct spraying of the target insect.

For aerial, use a minimum of 2 gals. per acre (gpa) except 10 gpa for peaches and nectarines; 15 gpa for oranges, lemons, grapefruit, tangelos and tangerines.

For certain crops a minimum of 1 gallon per acre may be used providing the following conditions are met:

- equipment is adjusted to distribute spray uniformly over the spray swath,
- wind conditions and other factors such as temperature and humidity are such that the spray is delivered to the target area,
- local regulations do not prohibit low-volume aerial sprays,
- use rates are applied as directed on the package label or supplemental labeling for the following crops:

Alfalfa	Celery	Peas (succulent)
Anise	Collards	Peppermint
Asparagus	Corn	Peppers
Barley	Cotton	Potato
Beans	Cucumber	Rye
Broccoli	Lettuce	Soybean
Brussels sprouts	Melons	Spinach
Cabbage	Mint	Sugar beet
Carrot	Oats	Summer Squash
Cauliflower	Peanuts	Wheat

Apply the low rates on small plants, small insects and light infestations of insects. Use intermediate rates on large insects and heavier infestations of insects. Use 1 to 3 applications of the highest recommended rate for controlling severe infestations. Thereafter, use the lowest rate possible to maintain control.

SPRAY TANK CLEANOUT

Immediately following application, thoroughly clean all spray equipment to reduce the risk of forming hardened deposits which might become difficult to remove.

Drain spray equipment. Thoroughly rinse sprayer and flush hoses, boom and nozzles with clean water.

Clean all other associated application equipment. Take necessary safety precautions when cleaning equipment. Do not clean near wells, water sources or desirable vegetation. Dispose of waste rinse water in accordance with local regulations.

CHEMIGATION

Instructions for the Use of ROTAM METHOMYL 90SP on Alfalfa, Barley, Oats, Green and Dry Bulb Onions, Potatoes, Rye, Sugar Beets and Wheat Using Overhead Sprinkler Chemigation

Do not apply thru Drip Chemigation unless accompanied by Rotam Supplemental Labeling.

Chemigation: Overhead sprinkler chemigation is allowed for use in alfalfa, barley, oats, onions, potatoes, rye, sugar beets, and wheat. Refer to supplemental, or Special Local Need (SLN) labeling or the crop specific sections of this label for use directions for chemigation. Do not apply this product through any other type of irrigation systems, except those allowed by instructions provided in a supplemental, SLN or this product label.

Overhead chemigation applications offer the advantage of greater penetration and coverage of the target plant. However, typical chemigation applications are more dilute than ground or aerial applications. For best results, it is recommended to keep the concentration of ROTAM METHOMYL 90SP as high as possible in the application. Apply ROTAM METHOMYL 90SP in 0.1 to 0.2 inches of water per acre. ROTAM METHOMYL 90SP is most active as a contact insecticide, although it does also have activity via ingestion of treated plants. For best results, applications of ROTAM METHOMYL 90SP should take place when the insects are active and most likely to come into direct contact with the application.

Types of Irrigation Systems

ROTAM METHOMYL 90SP may be applied through overhead sprinkler irrigation systems for control of various pests. Center pivot and lateral move irrigation systems are preferred. Other overhead sprinkler systems; such as end tow, side (wheel) roll and solid set, may be used if they provide uniform water distribution. Do not use filter screens smaller than 50 mesh throughout the system, due to possible build up of material on 100 mesh or smaller screens. Do not apply ROTAM METHOMYL 90SP through any other type of irrigation systems, except those allowed by instructions provided in a supplemental, SLN, or this product label.

General Directions for Chemigation

Preparation

A pesticide tank is recommended for the application of ROTAM METHOMYL 90SP in chemigation systems. Thoroughly clean the injection system and tank of any fertilizer or chemical residues using a standard clean-out procedure. Dispose of any residues in accordance with State and Federal laws. Add 1/4 to 1/2 of the desired amount of water and then measure the required amount of ROTAM METHOMYL 90SP into the tank. Complete filling the tank by adding the required amount of water. Agitate thoroughly to insure a uniform solution of ROTAM METHOMYL 90SP. Once in solution, no further agitation is required. Injection solution should not be stored overnight. Highly alkaline water should be buffered so that the pH of the spray solution is in the range of neutral to slightly acidic (pH5-7)

Injection into Chemigation Systems

Inject the proper amount of the ROTAM METHOMYL 90SP solution to the irrigation water flow using a positive displacement injection pump. Injection should occur at a point in the main irrigation water flow to ensure thorough mixing with the irrigation water. For continuously moving systems, inject the solution containing ROTAM METHOMYL 90SP into the irrigation water line continually and uniformly throughout the irrigation cycle. Apply in no more than 0.2 inches of water per acre. For overhead sprinkler systems that are stationary, add the solution containing ROTAM METHOMYL 90SP to the irrigation water line, and apply no more than 0.2 inches of water per acre, just before the end of the irrigation cycle.

Uniform Water Distribution

The irrigation system used for application of ROTAM METHOMYL 90SP must provide for uniform distribution of ROTAM METHOMYL 90SP treated water. Non-uniform distribution might result in crop injury, lack of effectiveness or illegal pesticide residues in or on the crop being treated. Ensure the irrigation system is calibrated to uniformly distribute the chemigation application to the crop. Contact the equipment manufacturer, the local University Extension agent or other experts if you have questions about achieving uniform distribution of the application.

Equipment Calibration

Calibrate the irrigation system and injector before applying ROTAM METHOMYL 90SP. Calibrate the injection pump while the system is running using the expected irrigation rate. If you have questions about calibration, you should contact your state extension service specialists, equipment manufacturer or other experts.

Monitoring of Chemigation Applications

A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of a responsible person, shall shut the system down and make necessary adjustments should the need arise. Wear the personal protective equipment as defined in the PPE section of the label for cleaners and repairers of application equipment when making adjustments or repairs on the chemigation system when ROTAM METHOMYL 90SP is in the irrigation water.

Required System Safety Devices

Do not connect any irrigation system used for pesticide applications to a public water system unless the pesticide label-prescribed safety devices are in place. Public water system means a system for the provision to the public of piped water for human consumption, if such a system has at least 15 service connections or regularly serves an average of at least 25 individuals at least 60 days out of the year.

1. The system must contain a functional check valve, vacuum relief valve and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.
2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut

off the pesticide injection pump when the water pump motor stops.

5. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.

6. Systems must use a metering pump such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

7. Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, backflow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, the water from the public water system should be discharged into a reservoir tank prior to pesticide introduction. There shall be a complete physical break (air gap) between the outlet end of the fill pipe and the top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.

Posting of Areas to be Treated

Posting of areas to be chemigated is required when 1) any part of a treated area is within 300 feet of sensitive areas such as residential areas, labor camps, businesses, daycare centers, hospitals, in-patient clinics, nursing homes, or any other public areas such as schools, parks, playgrounds, or other public facilities not including public roads, or 2) when the chemigated area is open to the public such as golf courses or retail greenhouses.

Posting must conform to all the following requirements. Treated areas shall be posted with signs at all usual points of entry and along likely routes of approach from the listed sensitive areas. When there are no usual points of entry, signs must be posted in the corners of the treated areas and in any other location affording maximum visibility to sensitive areas. The signs shall be printed in ENGLISH. Signs must be posted prior to application and must remain posted until foliage has dried and soil surface water has disappeared. Signs may remain in place indefinitely as long as they are composed of materials to prevent deterioration and maintain legibility for the duration of the posting period.

All words shall consist of letters at least 2 1/2 inches tall, and all letters and the symbol shall be a color, which sharply contrasts with their immediate background. At the top of the sign shall be the words "KEEP OUT", followed by an octagonal stop sign symbol at least 8 inches in diameter containing the word "STOP". Below the symbol shall be the words "PESTICIDE IN IRRIGATED WATER". Posting for chemigation does not replace other posting and reentry requirements for farm worker safety.

Operation

Start the water pump and sprinkler, and let the system achieve the desired pressure and speed before starting the injector. Start the injector and calibrate the injection system according to the directions above. This procedure is necessary to deliver the desired rate per acre in a uniform manner. Apply ROTAM METHOMYL 90SP in 0.1 to 0.2 inches of water per acre. When the application is finished, allow the entire irrigation and injector system to be thoroughly flushed clean before stopping the system. End guns must be turned off during the application, if they irrigate nontarget areas or if they do not provide uniform application and coverage.

It is recommended that nozzles in the immediate area of control panels, chemical supply tanks, wellheads and system safety devices be plugged to prevent contamination of these areas.

Do not apply when wind speed favors drift beyond the area intended for treatment.

Do not apply when system connections or fittings leak or when nozzles do not provide uniform distribution.

Cleaning the System

Thoroughly clean the injection system and tank of any fertilizer or chemical residues using a standard clean-out procedure. Dispose of any residues in accordance with State and Federal laws. Consult your owner's manual or your local equipment dealer for cleanout procedures for your injection system.

SPRAY DRIFT MANAGEMENT

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops. These requirements do not apply to forestry applications, public health uses or to applications using dry formulations.

1. The distance of the outer most nozzles on the boom must not exceed 3/4 the length of the wingspan or rotor.
2. Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

Where states have more stringent regulations, they should be observed.

The applicator should be familiar with and take into account the information covered in the Aerial Drift Reduction Advisory Information.

AERIAL DRIFT REDUCTION ADVISORY INFORMATION

Importance of Droplet Size

The most effective way to reduce drift potential is to apply large droplets (>150 - 200 microns). The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. The presence of sensitive species nearby, the environmental conditions, and pest pressure may affect how an applicator balances drift control and coverage. **APPLYING LARGER DROPLETS REDUCES DRIFT POTENTIAL, BUT WILL NOT PREVENT DRIFT IF APPLICATIONS ARE MADE IMPROPERLY OR UNDER UNFAVORABLE ENVIRONMENTAL CONDITIONS! See WIND, TEMPERATURE AND HUMIDITY, and TEMPERATURE INVERSIONS sections of this label.**

Controlling Droplet Size – General Techniques

- **Volume** - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- **Pressure** - Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types lower pressure produces larger droplets. Use the lower spray pressures recommended for the nozzle. Higher pressure reduces droplet size and does not improve canopy penetration. **WHEN HIGHER FLOW RATES ARE NEEDED, USE A HIGHER-CAPACITY NOZZLE INSTEAD OF INCREASING PRESSURE.**
- **Nozzle Type** - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

Controlling Droplet Size – Aircraft

- **Number of Nozzles** - Use the minimum number of nozzles that provide uniform coverage.
- **Nozzle Orientation** - Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
- **Nozzle Type** - Solid stream nozzles (such as disc and core with swirl plate removed) oriented straight back produce larger droplets than other nozzle types and the lowest drift.
- **Boom Length** - For some use patterns, reducing the effective boom length to less than 3/4 of the wingspan or rotor length may further reduce drift without reducing swath width.
- **Application Height** - Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.
- **Swath Adjustment** - When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downward edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.)

BOOM HEIGHT

Setting the boom at the lowest labeled height (if specified) which provides uniform coverage reduces the exposure of droplets to evaporation and wind. For ground equipment, the boom should remain level with the crop and have minimal bounce.

WIND

Drift potential is lowest between wind speeds of 3-10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 3 mph due to variable wind direction and high inversion potential. **AVOID GUSTY OR WINDLESS CONDITIONS.**

Note: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

TEMPERATURE AND HUMIDITY

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

TEMPERATURE INVERSIONS

Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain close to the ground and move laterally in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly

dissipates indicate good vertical air mixing.

SENSITIVE AREAS

The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from the sensitive areas).

SHIELDED SPRAYERS

Shielding the boom or individual nozzles can reduce the effects of wind. However, it is the responsibility of the applicator to verify that the shields are preventing drift and not interfering with uniform deposition of the product.

AIR ASSISTED (AIR BLAST) FIELD CROP SPRAYERS

Air assisted field crop sprayers carry droplets to the target via a downward directed air stream. Some may reduce the potential for drift, but if a sprayer is unsuitable for the application and/or set up improperly, high drift potential can result. It is the responsibility of the applicator to determine that a sprayer is suitable for the intended application, is configured properly, and that drift is not occurring.

Note: Air assisted field sprayers can affect product performance by affecting spray coverage and canopy penetration. Consult the application equipment section of this label to determine if use of an air assisted sprayer is recommended.

AIR ASSISTED (AIR BLAST) TREE AND VINE SPRAYERS

Air assisted tree and vine sprayers carry droplets into the canopy of trees and vines via a radially or laterally directed air stream. These sprayers are not suitable for applying herbicides. In addition to the general drift management principles already described, the following specific practices will further reduce the potential for drift:

Adjust deflectors and aiming devices so that spray is only directed into the canopy.

Block off upward pointed nozzles when there is no overhanging canopy.

Use only enough air volume to penetrate the canopy and provide good coverage.

Do not allow spray to go beyond the edge of the cultivated area. Spray the outside row only from outside the planting.

CROP AND RATE CHARTS

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Alfalfa	Pea Aphid Lygus Bugs Blotch Leafminer Aphids Egyptian Alfalfa Weevil Larvae Loopers Beet Armyworm Armyworm Alfalfa Caterpillar Fall Armyworm Western Yellowstriped Armyworm Yellowstriped Armyworm	1/2 – 1	7 *	48 hrs
	Alfalfa Weevil Larvae	1		
	Variegated Cutworm	1/4 - 1		
	Do not apply to dormant or semi-dormant alfalfa when min. daily temp. is 50° F, or lower. Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. * Do not apply within 7 days of cutting or allowing livestock to graze.			
Anise (Fennel)	Cabbage Looper	1	7	48 hrs
	Beet Armyworm	1/2 - 1		
Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop				
Apple(Ground application only)	Apple Aphid Rosy Apple Aphid Tufted Apple Budmoth Green Fruitworm Tarnished Plant Bug	1/2 - 1 *	14	72 hrs
	Codling Moth (10-12 day spray intervals)			
	Leafrollers (Fruit-tree, Obliquebanded, Redbanded, Variegated) Lesser Appleworm White Apple Leafhopper Tentiform Leafminer Cutworm	1 *		
Do not use on Early Macintosh & Wealthy varieties Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 5 applications per crop; minimum interval between treatments is 7 days. * Apply in a minimum of 50 gallons of water per acre.				

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Asparagus	Beet Armyworm, Western Yellowstriped Armyworm Asparagus Beetle Spotted Asparagus Beetle White Cutworm Redbacked Cutworm	1/2 - 1	1	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Avocado	Western Avocado Leafroller Omnivorous Looper	1/2 - 1	1	48 hrs
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Barley	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).			
Beans (Succulent) Including: Kidney, Lima, Mung, Navy, Pinto, Snap, Wax, Broad, Fava, Asparagus, Blackeyed peas Cowpeas, Chick peas, Garbanzo beans, Sweet lupine, White sweet lupine White lupine,	Leafhopper Mexican Bean Beetle	1/4 - 1	Succulent Beans 1/4 - 1/2 lb. - 1, over 1/2 lb. - 3; 3 Vines 7 Hay	48 hrs
	Fall Armyworm Variegated Cutworm	1/2		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Grain lupine	Beet Armyworm Corn Earworm Saltmarsh Caterpillar, Yellowstriped Armyworm Western Yellowstriped Armyworm, Lygus Bugs Thrips Aphids Loopers*	1/2 – 1		
	European Corn Borer (Ovicide & Larvicide)-- Initiate when moth flights first appear and-continue preventive treatments at 3-4 day intervals to control eggs and larvae			
	Spotted Cucumber Beetle	1/4 – 1/2		
	Succulent Beans - Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. * Do not use for Loopers in AL & GA.			
Beans (Dry) (Follow Beans, Succulent)	(Follow Beans, Succulent)	(Follow Beans, Succulent)	14 - Dry Beans * 14 - Vines * 14 - Hay *	48 hrs
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting.			
Beets (Table)	Imported Cabbageworm	1/4 - 1	0 - roots 10 - tops	48 hrs
	Beet Armyworm Cabbage Looper Diamondback Moth	1/2 - 1		
	Cucumber Beetle Variegated Cutworm	1/2		
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Bermudagrass pasture	Fall Armyworm Armyworm Striped Grass Looper	1/4 - 1	7 - Forage * 3 - Dehydrated Hay **	48 hrs
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. * Do not apply within 7 days of feeding forage or allowing livestock to graze. ** Do not apply within 3 days of cutting for hay.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Blueberries	Blueberry Leafhopper Aphids Tussock Moth Weevil Sharp-Nosed Leafhopper	1/2	3	48 hrs
	Cranberry Fruitworm* Cherry Fruitworm*	1/2 - 1		
	Flea Beetle (larvae) Sawfly (larvae) Blueberry Leafroller	1		
	Blueberry Maggot	1/4 - 1/2		
	Do not apply during bloom. Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than applications per crop. * For ground use only.			
Broccoli	Loopers, Diamondback Moth	1/2 - 1 **	3	48 hrs
	Imported Cabbageworm	1/4 - 1 **		
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. ** Add a wetting agent to improve coverage.			
Brussels Sprouts	Loopers Imported Cabbageworm, Diamondback Moth	1/2 - 1 **	3	48 hrs
	Variegated Cutworm	1/2 **		
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. ** Add a wetting agent to improve coverage			
Cabbage	Loopers * Diamondback Moth Fall Armyworm	1/2 - 1 **	1	48 hrs
	Imported Cabbageworm	1/4 - 1 **		
	Variegated Cutworm	1/2 **		
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 15 applications per crop; minimum interval between treatments is 2 days. * Do not use for Loopers in AL & GA. ** Add a wetting agent to improve coverage			
Carrot	Beet Armyworm Armyworms Aster Leafhopper	1/2 - 1	1	48 hrs
	Variegated Cutworm	1/4 - 1/2		
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Cauliflower	Imported Cabbageworm	1/4 - 1 **	3	48 hrs
	Loopers Diamondback Moth	1/2 - 1 **		
	Variegated Cutworm	1/2 **		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. ** Add a wetting agent to improve coverage.			
Celery	Beet Armyworm	1/2 - 1	7	48 hrs
	Aster Leafhopper			
	Loopers	1		
	Variegated Cutworm	1/2		
	Armyworms	1/4 - 1		
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Chicory	Beet Armyworm Variegated Cutworm Leafhoppers	1/2 - 1	80	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Chinese Cabbage	Loopers Beet Armyworm	1/2 - 1*	10	48 hrs
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP/acre/crop. Do not make more than 10 applications/crop. * Minimum of 25 gallons water per acre by ground or 5 gallons by air.			
Collards (Fresh market only)	Diamondback Moth Variegated Cutworm	1/2	10	48 hrs
	Imported Cabbageworm Beet Armyworm Loopers*	1/2 - 1		
	Do not apply when temperature is less than 50° F. Do not apply when crop is less than 10" tall. Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop. * Do not use for Loopers in AL & GA.			
Corn (Field, Popcorn & Seed)	Earworm (Ovicide/Larvicide)	1/4 - 1/2	21- Ears 3 - Forage* 21 - Stover*	48 hrs
	Armyworm Fall Armyworm European Corn Borer- Ears 1-3 days or as needed Corn Rootworm (adult beetles) Flea Beetles Picnic Beetles Aphids			
	Variegated Cutworm, Beet Armyworm	1/2		
	Do not apply more than 2.5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. *Corn forage is green actively growing plants that are harvested with the ears intact, then plants can be fed directly to animals or used to make silage. Corn stover are the parts of the plant that remain after removal of the grain at full plant maturity. These remaining stalks and leaves can be fed as roughage to animals.			
Corn (Sweet)	Earworm-Whorl as needed	1/3 - 1/2	0 - Ears 3 - Forage 21- Stover	48 hrs
	Fall Armyworm Armyworm	1/4 - 1/2		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
	Earworm,- (Ovicide/Larvicide) European Corn Borer- Ears 1-3 days or as needed Corn Rootworm (adult beetles) Flea Beetles Picnic Beetles Aphids			
	Variegated Cutworm Beet Armyworm	1/2		
	Certain hybrid varieties of sweet corn are susceptible to methomyl injury. Treat a small area to determine crop safety before full scale spraying. Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 28 applications per crop; minimum interval between treatments is 1 day.			
Cotton All U.S.	Ovicide/Larvicide - Bollworm, Tobacco Budworm (Initiate schedule when significant numbers of eggs are present. Continue at 3 to 5-day intervals while eggs are present and larval control is adequate. If significant larvae survive, use higher rates below.) Lygus Bugs/Plant Bugs (adults and nymphs) start treatment on low level population for suppression.	1/8 - 1/4 (see Insect Predator Section)	15	72 hrs
	Cotton Leafworm	1/4 - 1/2		
	Cotton Fleahopper (as needed)	1/8 - 1/4		
	Aphids, Thrips	1/4		
East of Rockies Only	(Early Season) Bollworm, Tobacco Budworm, Beet Armyworm, Cotton Leafperforator, Fall Armyworm, Lygus Bugs/Plant Bugs (adults and nymphs) Use as occasional spray in regular schedule but not more often than every 10 days.	1/2		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
East of Rockies Only	(Late Season) Bollworm, Tobacco Budworm, Beet Armyworm, Cotton Leafperforator, Fall Armyworm, Lygus Bugs/Plant Bugs (adult and nymphs). Up to 3 applications at 3-5 day intervals after desired boll load set on plants.	1/2 - 3/4	15	72 hrs
Texas	Cotton Aphid	1/4 - 2/3		
West of Rockies only	Larvicide for worms Bollworm, Fall Armyworm, Tobacco Budworm, Lygus Bugs Beet Armyworm	1/2 - 3/4		
	Cotton Leafperforator	1/3 - 3/4		
For applications West of the Rockies, make applications on 3-5 day intervals after desired boll load set on plants. For all cotton applications: Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop . Use may redden cotton. If excessive stop or alternate with other insecticides. Do not graze or feed.				
Cucumber	Loopers Tobacco Budworm Beet Armyworm, Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickleworm Fall Armyworm	1/2 - 1	1/2 lb. -- 1 Over 1/2 lb.- 3	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 12 applications per crop.			
Eggplant	Green Peach Aphid	1/4 - 1	5	48 hrs
	Tomato Pinworm (Ground Application only) Beet Armyworm Corn Earworm	1/2 - 1		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Endive, Escarole	Beet Armyworm	1/2 - 1	10	48 hrs
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Garlic	Beet Armyworm	1/2 **	7	48 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 6 applications per crop. ** Add a wetting agent to improve coverage.			
Grapefruit CA, AZ & HI only	Thrips Fruittree Leafroller Orange Tortrix Western Tussock Moth Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Horseradish Ground application only	Aphids Thrips	1/2	65	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application - Days To Harvest	REI
Leafy Green Vegetables: Beet (tops) Dandelions, Kale, Mustard Greens, Parsley, Swiss Chard, Turnip Greens	Beet Armyworm Cabbage Looper* Diamondback Moth Imported Cabbageworm	1/2 - 1	10	48 hrs
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop . * Do not use for Cabbage Loopers in AL & GA.			
Lemon CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Lentils	Western Yellowstriped Armyworm	1/2 - 1	21	48 hrs
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Lettuce (Head and Leaf varieties)	Alfalfa Looper	1/4 - 1	1/4-1/2 lb. - 7 over 1/2 lb. - 10	48 hrs
	Thrips Aphids Beet Armyworm Cabbage Looper Corn Earworm Aster Leafhopper	1/2 - 1		
	Variegated Cutworm	1/2		
	Lettuce (head varieties) Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 15 applications per crop; minimum interval between treatments is 2 days. Lettuce (leaf varieties) Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop; minimum interval between treatments is 2 days.			
Melons Including: Cantaloupe Casaba Santa Claus melon Crenshaw melon Honeydew melon Honey balls Persian melon Golden Pershaw melon Mango melon Pineapple melon Snake melon Watermelon	Loopers Tobacco Budworm Beet Armyworm Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickleworm Fall Armyworm	1/2 - 1	1/2 lb. -- 1 over 1/2 lb. -- 3	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 12 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application - Days To Harvest	REI
Mint (Peppermint, Spearmint)	Variegated Cutworm	1	14	48 hrs
	Alfalfa Looper			
	Flea Beetles	3/4 - 1		
Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.				
Nectarine CA & AZ only	Thrips	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 3 applications per crop.			
Oats	Armyworms	1/4 - 1/2	7	48 hrs
	Cereal Leaf Beetle* Aphids**			
Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).				
Onions (Green & Dry Bulb)	Beet Armyworm	1/2 - 1 **	7 - Green and Dry Bulb Onions	48 hrs
	Thrips*	1 **		
	Variegated Cutworm Black Cutworm			
Onions, green Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop; minimum interval between treatments is 5 days. Onions, dry bulb Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop; minimum treatment interval between treatments is 5 days. *Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation to control thrips. Begin applications before thrip populations reach 3-5 thrips per plant. For best results, add a wetting agent. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. ** Add a wetting agent to improve coverage.				

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Oranges CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix Fruittree Leafroller Beet Armyworm Citrus Cutworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Peaches	Catfacing Insects (Plant Bugs and Stink Bugs) - begin at petal fall and continue in cover sprays at 7-to 10-day intervals Oriental Fruit Moth* -begin at petal fall; use trapping devices and frequent field inspection to determine need for treatment. Continue treatment in cover sprays and alternate with residual-type insecticides registered for this use. Green Peach Aphid	1 lb (or 1/4 lb per 100 gal up to 400 gal per acre)	4	4 days
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 6 applications per crop. * Oriental Fruit Moth (Ground Application Only).			
Peanuts	Corn Earworm* Potato Leafhopper Fall Armyworm	1/4 - 1	21	48 hrs
	Beet Armyworm	3/8 - 1		
	Green Cloverworm Velvetbean Caterpillar Cabbage Looper Soybean Looper ** Thrips Granulate Cutworm	1/2 - 1		
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop. * ROTAM METHOMYL 90SP has ovicidal and larvicidal control on corn earworm. **Soybean Looper is difficult to control. Do not apply to worms greater than 1 per 2" long. Use higher rate for severe infestations. Do not feed treated vines.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application - Days To Harvest	REI
Pears Northeast only	Green Fruitworm Oblique banded Leafroller	1/2 - 1 *	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop. * Apply in a minimum of 50 gallons of water per acre.			
Peas (succulent) Including: Pigeon peas Chick peas Garbanzo beans Dwarf peas Garden peas Green peas English Peas Field peas Edible pod peas	Alfalfa Looper Cabbage Looper* Pea Aphid Beet Armyworm Saltmarsh Caterpillar Variegated Cutworm	1/2 - 1	1 - Peas 5 - Forage 14 - Hay	48 hrs
	Alfalfa Caterpillar Armyworm Green Cloverworm	1/4 - 1		
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 6 applications per crop; minimum interval between treatments is 3 days. * Do not use for Cabbage Loopers in AL & GA.			
	Pecans Southeast only	Aphids	1/2 - 1	
Do not apply more than 7 pounds of ROTAM METHOMYL 90SP/acre/crop. Do not make more than 7 applications per crop.				
Peppers Including: Bell Hot Pimentos Sweet	Loopers Beet Armyworm Green Peach Aphid Armyworm Fall Armyworm	1/2 - 1	3	48 hrs
	Variegated Cutworm	1/4 - 1/2		
	European Corn Borer	1		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Pomegranates	Omnivorous Leafroller	1	14	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Potato	Tuberworm* Loopers Aphids Beet Armyworm Leafhoppers Fall Armyworm	1/2 - 1	6	48 hrs
	Variegated Cutworm Flea Beetles	1/2		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Potato (cont.)	<p>Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section.</p> <p>*Repeat applications of ROTAM METHOMYL 90SP on a 5-7 day schedule, or longer as needed, to control tuber worm populations. An application schedule of effective insecticides with different modes of action may be needed to keep foliar feeding larval populations as low as possible prior to harvest to reduce the risk of larval damage to the tubers. Failure to adequately control tuberworm larvae prior to crop senescence or vine kill increases the risk of tuber damage.</p>			
Rye	<p>Armyworms</p> <p>Cereal Leaf Beetle*</p> <p>Aphids**</p>	1/4 - 1/2	7	48 hrs
	<p>Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.</p> <p>Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information.</p> <p>*Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California.</p> <p>**Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).</p>			
Sorghum	Sorghum Webworm	1/2 *	14 **	48 hrs
Including: Sudangrass (Except Sweet Sorghum)	<p>Sorghum Midge</p> <p>--Apply when 50% bloom and 3-5 days later if needed.</p> <p>Fall Armyworm (Budworm)</p> <p>Beet Armyworm</p> <p>Corn Earworm</p> <p>Armyworm</p>	1/4 - 1/2 *		
	<p>Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.</p> <p>* Minimum of 10 gallons per acre by ground or 2 gallons per acre by air.</p> <p>** Do not apply within 14 days of feeding forage or cutting for hay.</p>			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Soybeans	Green Cloverworm Velvetbean Caterpillar Mexican Bean Beetle Corn Earworm Light to Moderate infestations	1/8 - 1/4 (see Insect Predator section)	14 - Soybeans 3 - Forage 12 - Hay	48 hrs
	Moderate to severe infestations	1/4 - 1/2		
	Soybean Aphid	1/6 - 1/3		
	Beet Armyworm Salt Marsh Caterpillar Bean Leaf Beetle Fall Armyworm Thrips Silver Spotted Skipper Light to Moderate infestations	1/4 - 3/8		
	Moderate to severe infestations	3/8 - 1/2		
	Do not apply more than 1.5 pounds of ROTAM METHOMYL 0SP per acre per crop. Do not make more than 3 applications per crop.			
Spinach	Alfalfa Loopers Cabbage Looper Beet Armyworm Fall Armyworm	1/2 - 1	7	48 hrs
	Variegated Cutworm	1/2		
	Do not apply when minimum daily temperature is 32° F, or lower. Do not apply to seedlings less than 3" diameter. Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Sugar Beet	Beet Webworm Flea Beetles Carrion Beetles Beet Armyworm* Aphids* Western Yellowstriped Armyworm*	1/4 - 1	30 -Tops 21 - Roots	48 hrs
	Variegated Cutworm	1/2		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Sugar Beet (cont.)	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. *Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation to control beet armyworm, aphids and western yellowstriped armyworm. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information.			
Summer Squash* Including: Crookneck squash Straightneck squash Scallop squash Vegetable marrow Spaghetti squash Hyotan Cucuzza Hechima Chinese okra Bitter melon Balsam pear Balsam apple Chinese Cucumber	Loopers Tobacco Budworm Beet Armyworm Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickleworm Fall Armyworm	1/2 - 1	1/2 lb. -- 1 day over 1/2 lb.-- 3 days	48 hrs
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 12 applications per crop. *Fruit of the Gourd (Cucurbit accae) family that are consumed when immature, 100% of the fruit is edible cooked or raw, once picked cannot be stored, has a soft rind which is easily penetrated, and if seeds were harvested they would not germinate.			
Tangelo, Tangerine CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix, Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Tobacco (Except shade)	Flea Beetle Hornworm	1/4 - 1/2	5 - Flue cured 14 - Air or fire cured	48 hrs
	Loopers Aphids Tobacco Budworm Fall Armyworm	1/2		
	Do not apply more than 2.5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 5 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Tomato (Including Tomatillos*)	Tomato Fruitworm Aphids Hornworm Loopers Beet Armyworm Southern Armyworm Pinworm Armyworm Fall Armyworm	1/2 - 1	1	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop Do not make more than 16 applications per crop. * For tomatillos do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop . Do not make more than 5 applications per crop.			
Turf (For use on sod farms only)	Sod Webworm (after application, sprinkle irrigate for 15 minutes)	1 (2/5 ozs. per 1000 sq. ft.)		48 hrs
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Do not graze or feed.			
Wheat	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications to s on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).			

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Handle this package carefully to prevent breakage of inner bag when stored at low temperatures. Allow to warm above 50 Deg.F for normal handling. Store product in original container only. Do not contaminate water, other pesticides, fertilizer, food or feed in storage. Not for use or storage in or around the home.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: For Water Soluble Packets: Do not reuse the outer box or the resealable plastic bag. When all water-soluble packets are used, the outer packaging should be clean and may be disposed of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by open burning. If burned, stay out of smoke. If the resealable plastic bag contacts the formulated product in any way, the bag must be triple-rinsed with clean water. Add the rinsate to the spray tank and dispose of the outer wrap as described above.

For Paper and Plastic Bags: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In the event of a major spill, fire or other emergency, call CHEMTREC Day or Night, 1-800-424-9300.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Rotam Agrochemical Company Limited or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Rotam Agrochemical Company Limited and Seller harmless for any claims relating to such factors.

Rotam Agrochemical Company Limited warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Rotam Agrochemical Company Limited, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW ROTAM LTD MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the extent consistent with applicable law, Rotam Agrochemical Company Limited or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ROTAM AGROCHEMICAL COMPANY LIMITED AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ROTAM AGROCHEMICAL COMPANY LIMITED OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Rotam Agrochemical Company Limited and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of Rotam Agrochemical Company Limited.

Manufactured by:
Rotam Agrochemical Company Ltd.
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong
1-866-927-6826

Registered: [TBA]

RESTRICTED USE PESTICIDE

Due to high Acute Toxicity to Humans

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

GROUP 1A INSECTICIDE

Rotam Methomyl 90SP Insecticide In Water Soluble Packets

Active Ingredient	By Weight
Methomyl (S-methyl-N-[(methylcarbamoyl) oxy]thioacetimidate)	90%
Other Ingredients	10%
TOTAL	100%

EPA Reg. No. 83100 - 28

EPA Est. No.: 69821-CHN-005

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Net Contents:
Packets/Container
TBA

Registered: (TBA)

KEEP OUT OF REACH OF CHILDREN
DANGER POISON



PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

Refer to inside label booklet for additional precautionary information including Personal Protective Equipment (PPE), User Safety Recommendations, Engineering Controls Statements, Environmental Hazards and Directions For Use.

FIRST AID

(N-Methyl Carbamate insecticide)

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

ATROPINE IS AN ANTIDOTE --SEEK MEDICAL ATTENTION AT ONCE IN ALL CASES OF SUSPECTED POISONING.

If poisoning symptoms appear (see POISONING SYMPTOMS), get medical attention.

POISONING SYMPTOMS — Methomyl poisoning produces effects associated with anticholinesterase activity which may include weakness, blurred vision, headache, nausea, abdominal cramps, discomfort in the chest, constriction of pupils, sweating, slow pulse, muscle tremors. If poisoning symptoms appear, refer to First Aid section and seek medical attention at once.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

TREATMENT — Atropine sulfate should be used for treatment. Administer repeated doses, 1.2 to 2.0 mg. intravenously every 10 to 30 minutes until full atropinization is achieved. Maintain atropinization until the patient recovers. Artificial respiration or oxygen may be necessary. Allow no further exposure to any cholinesterase inhibitor until recovery is assured.

Do not use 2-PAM for exposure to ROTAM METHOMYL 90SP alone. However, for exposure to combinations of ROTAM METHOMYL 90SP and organophosphorous insecticides, 2-PAM may be used as required to supplement the atropine sulfate treatment. Do not use morphine.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

You may also contact the National Poison Control Center 24-hr Emergency Hotline at: 1-800-222-1222.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

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Restricted Use Pesticide due to toxicity categories. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

Fatal if swallowed. May be fatal if inhaled or gets in eyes. Do not breathe dust. Do not get in eyes. Avoid contact with clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, loaders, applicators, cleaners, repairers of application equipment, and others exposed to the concentrate must wear:

- Long sleeve shirt and long pants.
- Chemical-resistant gloves, such as barrier laminate or butyl rubber.
- Socks and chemical resistant footwear.
- Protective eyewear.
- Chemical resistant apron.
- Respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or a canister with any R, P, or HE prefilter.

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

USERS SHOULD:

- Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove personal protective equipment immediately after handling this product.
- Wash the outside of gloves before removing.
- As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, and mammals. Do not apply

directly to water or areas where surface water is present or intertidal areas below the mean high-water mark. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area. This chemical is known to leach through soil into groundwater under certain conditions as a result of label use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

This chemical can contaminate surface water through spray drift. Under some conditions, it may also have a high potential for runoff into surface water for several days to weeks after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, and areas overlaying extremely shallow groundwater, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas over-laying tile drainage systems that drain to surface water.

PHYSICAL AND CHEMICAL HAZARDS

Keep container closed. Use with adequate ventilation.

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Net Contents:
Packets/Container
TBA



reviews for methomyl 83100-27, 83100-28

Thomas Harris o Frank Sobotka

04/06/2011 06:11 PM

Dr. Sobotka,

Attached are the product chemistry and acute toxicology reviews for Rotam methomyl products 83100-27 and 83100-28 which were registered yesterday (4/5/2011). Please use these copies to replace any previous versions I had sent you (some minor administrative changes made on earlier version of a couple of reviews). Unless requested otherwise, I will not mail you paper copies of this material. This email (and yesterday's email with the stamped labels) will constitute the official delivery of this material.

Again, thank you for your prompt attention to any issues we brought up and to label revisions as they were requested.

83100-ET



83100-ET.product chemistry.20110318.no CBI.pdf



83100-ET.product chemistry.addendum.20110318.no CBI.pdf



83100-00027.acute tox review.20110228.pdf

83100-EI



083100-00028.prod chem.20110331.no CBI.image.pdf



083100-00028.prod chem addendum.20110331.no CBI.image.pdf



83100-00028.acute tox review.20110310.pdf

Tom Harris
EPA/OCSP/OPP/RD/IRB
voice: (703) 308-9423
fax: (703) 308-0029
harris.thomas@epa.gov
visit <http://www.epa.gov/pesticides>

FEE

DP BARCODE: D388049
PC Code: 090301
FOOD Use: Yes

FILE SYMBOL No.: 83100-EI
Action Code: R310

DECISION No.: 439798

DATE OUT: 31 March 2011

SUBJECT: End Use Product Chemistry Review
Product Name: Rotam Methomyl 90SP Insecticide

FROM: Bruce F. Kitchens, Chemist
Product Chemistry Team
Technical Review Branch / Registration Division (7505P)

Bruce F. Kitchens
31 Mar 2011
SFB
415711

TO: PM #07, John Hebert/Thomas Harris
Insecticide-Rodenticide Branch / Registration Division (7505P)

Company Name: Rotam Agrochemical Co., Ltd
Formulation Type: Solid

A. INTRODUCTION:

The applicant submitted an application for registration of a new food use end use product. In support of the application, the applicant submitted product chemistry data corresponding to Guideline 830 series, group A contained in MRID# 484168-01. This data is an addendum to a previously reviewed MRID# 482261-01. Revised basic and alternate formula CSFs dated 07 Mar 2011 and 16 Mar 2011, respectively were also submitted. The data contained in this submission have been reviewed in DP Barcode D383461 dated 31 Mar 2011.

FEE

DP BARCODE: D383461
PC Code: 090301
FOOD Use: Yes

FILE SYMBOL No.: 83100-EI
Action Code: R310

DECISION No.: 439798

DATE OUT: 31 March 2011

SUBJECT: End Use Product Chemistry Review
Product Name: Rotam Methomyl 90SP Insecticide

FROM: Bruce F. Kitchens, Chemist
Product Chemistry Team
Technical Review Branch / Registration Division (7505P)

Bruce F. Kitchens
31 Mar 2011
SRB 415711

TO: PM #07, John Hebert/Thomas Harris
Insecticide-Rodenticide Branch / Registration Division (7505P)

Company Name: Rotam Agrochemical Co., Ltd
Formulation Type: Solid

A. INTRODUCTION:

The applicant submitted an application for registration of a new food use end use product. In support of the application, the applicant submitted product chemistry data corresponding to Guideline 830 series, group A & group B contained in MRIDs 482261-01 through 482261-03. A CSF for a basic formulation (dated 07 Mar 2011) was submitted along with the product label. During the course of this review, the applicant submitted an alternate formula CSF dated 16 Mar 2011. In addition, the applicant states that the proposed product is substantially similar to EPA Reg. No. 352-342 Lannate SP. TRB has been asked to determine the acceptability of the product chemistry data and the proposed CSF. The primary review of this submission was conducted by the Oak Ridge National Laboratory (ORNL).

B. SUMMARY OF FINDINGS:

1. Name of Active Ingredient: Methomyl (90.0% a.i.)

2. Has the registrant claimed substantial similarity to registered product?

[X] Yes; [] No; [] NA; if yes give the registration number of the cited product.
EPA Reg. No.: 352-342

3. All the source materials for the active ingredients are derived from registered sources:
[] Yes; [X] No

The TGAI (File Symbol [REDACTED]) is being registered concurrently.

DP BARCODE No.: D383461

FILE SYMBOL No.: 83100-EI DECISION No.: 439798

PC Code: 090301

Action Code: R 310

FOOD Use: Yes

4. All inert ingredients have been screened by IIAB and found to be approved for the proposed labeled uses

☒ Yes; ☐ No.

5. Confidential Statements of Formula:

☒ Basic - Dated: November 9, 2009 resubmitted - Dated: 07 Mar 2011

☒ Alternate # 1 - Dated: 16 Mar 2011

Alternate CSF complies with 40 CFR §152.43 ☒ Yes; ☐ No; ☐ NA

6. Product label

a. Ingredient statement: Nominal concentration of AI listed on CSFs concur with product label (PR Notice 91-2)

☒ Yes ☐ No, if not, explain below:

Is the sub statement in compliance with PR Notice 97-6 (Inert ingredient vs. other ingredient)

☐ Yes; ☒ No; if not, explain below.

Label ingredient statement still lists "Inert Ingredients" instead of "Other Ingredients"

Metallic equivalent: ☐ Yes ☒ NA;

Soluble arsenic: ☐ Yes ☒ NA

Isomeric ratios: ☐ Yes ☒ NA

Acid equivalent: ☐ Yes ☒ NA

b. Health related sub statements: Product contains?

Petroleum distillate at > 10%: ☐ Yes ☐ No ☒ NA

Methanol at > 4%: ☐ Yes ☐ No ☒ NA

c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for flammability, explosive potential or electric insulator breakdown?

☐ Yes ☒ No

Is the sub statement in compliance with PR Notice 98-6? (Total Release Fogger)

☐ Yes ☐ No; ☒ NA if not, explain below:

d. Label requires an additional Storage and Disposal statement: ☐ Yes ☒ No; if yes explain below:

DP BARCODE No.: D383461
PC Code: 090301
FOOD Use: Yes

FILE SYMBOL No.: 83100-EI DECISION No.: 439798
Action Code: R 310

7. Group A: Product Chemistry Data

TRB's determination of the acceptability of the data for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		TRB's Assessment of Data	MRID Nos.
			Yes	No		
830.1550	Product Identity & Composition		X		A	482261-01 484168-01
830.1600	Description of materials used to produce the product		X		A	482261-01 484168-01
830.1650	Description of formulation process		X		A	482261-01 484168-01
830.1670	Discussion on the formation of impurities		X		A	482261-01 484168-01
830.1700	Preliminary analysis			X	NA	
830.1750	Certified limits (158.350)	Standard certified limits	X		A	see csf 3/7/11
		Proposed Limits				
		Justification for wider limits				
830.1800	Enforcement analytical method		X		A	482261-02

A = Acceptance, N = Not Acceptable, G = Data Gap,
W = Waiver Request, I = In Progress, NA = Not Applicable

DP BARCODE No.: D383461
PC Code: 090301
FOOD Use: Yes

FILE SYMBOL No.: 83100-EI **DECISION No.: 439798**
Action Code: R 310

8. Group B:

Guideline No.	Study Title	Value or Qualitative Description	TRB's Assessment of Data	MRID Nos.
830.6303	Physical State	Powder	A	482261-03
830.6315	Flammability	Contains no flammable ingredients	NA	482261-03
830.6316	Explodability	Not potentially explosive	NA	482261-03
830.7000	pH	5.27 (1% solution in deionized water)	A	482261-03
830.7300	Density (units)	0.414 g/mL (pour) 0.500 g/mL (tap)	A	482261-03

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver request,
NA = Not applicable, I = In progress

DP BARCODE No.: D383461
PC Code: 090301
FOOD Use: Yes

FILE SYMBOL No.: 83100-EI **DECISION No.: 439798**
Action Code: R 310

C. CONCLUSIONS:

The TRB has reviewed the CSFs and product chemistry data for the proposed end use product and has concluded:

1. The proposed basic CSF dated 07 Mar 2011 is acceptable. Acceptance of this product for registration is contingent upon the registration of the source of the active ingredient.
2. The proposed alternate CSF dated 16 Mar 2011 is acceptable.
3. The data submitted corresponding to Group A were reviewed and determined to be acceptable.
4. The data submitted corresponding to Group B were reviewed and determined to acceptable. The data requirements for storage stability and corrosion characteristics are a data gap. The applicant states that studies are in progress and will be submitted to the Agency for evaluation upon completion.
5. The proposed product meets the criteria specified in 40 CFR 152.43 with respect to alternate formulations.
6. The proposed product is substantially similar in composition to EPA Reg. No. 352-342 Lannate SP.
7. The proposed label was screened as it pertains to the product chemistry requirements. The final review of the proposed label and uses are the purview of the RM team. Require applicant to revise the label ingredient statement to comply with PR-Notice 97-6. This guidance requires the use of "Other Ingredients" instead of "Inert Ingredients".

DATA EVALUATION RECORD

METHOMYL (Rotam Methomyl 90SP Insecticide)

STUDY TYPES: Product Identity and Composition (OPPTS 830.1550)
Description of Materials Used to Produce the Product (OPPTS 830.1600)
Description of Production Process (830.1620)
Discussion of Formation of Impurities (OPPTS 830.1670)
Preliminary Analysis (OPPTS 830.1700)
Certified Limits (OPPTS 830.1750)
Enforcement Analytical Method (OPPTS 830.1800)
Physical and Chemical Characteristics (OPPTS 830.6302-830.7950)

MRIDs 482261-01 through 482261-03

Prepared for
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Prepared by
Toxicology and Hazard Assessment Group
Environmental Sciences Division
Oak Ridge National Laboratory
Oak Ridge, TN 37831
Task Order No. 1-89

Primary Reviewer:
Eric B. Lewis, M.S.

Signature: _____
Date: _____

Eric B. Lewis
JAN 27 2011

Secondary Reviewers:
Sylvia Milanez, Ph.D., D.A.B.T.

Signature: _____
Date: _____

Sylvia Milanez
JAN 27 2011

Cheryl B. Bast, Ph.D., D.A.B.T., Group Leader

Signature: _____
Date: _____

Cheryl B. Bast
JAN 27 2011

Quality Assurance:
Kimberly G. Slusher, M.S.

Signature: _____
Date: _____

Kimberly G. Slusher
JAN 27 2011

Disclaimer

This review may have been altered subsequent to the contractor's signatures above.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 10, 2011

MEMORANDUM

Subject: Name of Pesticide Product: ROTAM METHOMYL 90SP INSECTICIDE
EPA Reg. No. /File Symbol: 83100-EI
DP Barcode: DP 383462
Decision No.: 439798
Action Code: R310
PC Codes: 090301 (Methomyl: 90%)

From: Byron T. Backus, Ph.D., Toxicologist
Technical Review Branch
Registration Division (7505P)

Byron T. Backus
March - 10 - 2011
M. Hashim
T.L. Toxicology

To: Tom Harris RM 07
Insecticide-Rodenticide Branch
Registration Division (7505P)

Registrant: ROTAM AGROCHEMICAL COMPANY LIMITED

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>by wt.</u>
090301 Methomyl	90%
<u>Other Ingredient(s):</u>	10%
TOTAL	100%

ACTION REQUESTED: The Risk Manager requests:

"83100-EI methomyl new water soluble packet product (90%). Please review acute product toxicology (MRID 48226104) for this new generic methomyl product. Also, please comment on claim of similarity to 352-342."

BACKGROUND:

The material received for review includes a set of 6 acute toxicity studies, bound within one volume which has been assigned MRID 48226104. It also includes a CSF (dated 11/9/2009) for 83100-EI and labels for both 83100-EI and EPA Reg. No. 352-342.

COMMENTS AND RECOMMENDATIONS:

1. All six of the acute studies have been classified as acceptable. These studies satisfy the acute toxicity data requirements for the registration of 83100-EI (Rotam Methomyl 90SP Insecticide).
2. The following is the acute toxicity profile for EPA File Symbol 83100-EI (Rotam Methomyl Technical), based on the results of the acute toxicity studies:

Acute oral toxicity	I	Acceptable	MRID 48226104*
Acute dermal toxicity	IV	Acceptable	MRID 48226104*
Acute inhalation toxicity	II	Acceptable	MRID 48226104*
Primary eye irritation	III ^b	Acceptable	MRID 48226104*
Primary dermal irritation	IV	Acceptable	MRID 48226104*
Dermal sensitization	Negative	Acceptable	MRID 48226104*

*All studies are bound in a single volume under this MRID number.

^a Results from instillation of 0.05 mL, presumably because of toxicity considerations. Eye protection is mandatory for this product. The statement: "MAY BE FATAL IF GETS IN EYES" which appears in the precautionary statement for EPA Reg. No. 352-342 would also be appropriate for 83100-EI.

3. The acute toxicity profile given above is consistent with the precautionary statements on the label for EPA Reg. No. 352-342, indicating the two products are toxicologically similar.
4. Based on the acute toxicity profile above, and taking into consideration the proposed uses specified on the label and information in the CSF, the following would be the precautionary and first aid labeling for EPA File Symbol 83100-EI [Rotam Methomyl 90SP Insecticide] as obtained from the Label Review System:

PRODUCT ID #: 083100-00028

PRODUCT NAME: ROTAM METHOMYL 90SP INSECTICIDE

PRECAUTIONARY STATEMENTS

SIGNAL WORD: DANGER POISON ☠

SPANISH SIGNAL WORD: PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

Hazards to Humans and Domestic Animals:

Restricted Use Pesticide due to toxicity categories. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

Fatal if swallowed. May be fatal if inhaled or gets in eyes. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Do not breathe dust. Remove and wash contaminated clothing before reuse. Avoid contact with clothing. Do not get in eyes. Wear protective eyewear. Wear: Long-sleeved shirt and long pants, Socks, chemical-resistant shoes, and chemical-resistant gloves (such as barrier laminate or butyl rubber).

For handling activities, use a non-powered air purifying respirator equipped with an N-, R-, or P-series filter.

First Aid:

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor.
- Do not give anything to an unconscious person.

If inhaled:

- Move the person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for further treatment advice.

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Note to CRM/PM/Registrant: The proposed label should contain a "Note to Physician" which addresses the presence of a cholinesterase inhibitor. The following statements are suggested types of information that may be included, if applicable: - technical information on symptomatology; - use of supportive treatments to maintain life functions; - medicine that will counteract the specific physiological effects of the pesticide; - company telephone number to specific medical personnel who can provide specialized medical advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

5 . The CSF (dated 11/9/2009) for 83100-EI should also be reviewed and accepted by the TRB Chemistry Team.

Reviewer: Byron T. Backus, Ph.D.

Date: February 28, 2011

Risk Manager (EPA): 07

STUDY TYPE: Acute Oral Toxicity – Rat; OPPTS 870.1100; OECD 401

TEST MATERIAL: Methomyl 90% SP (soluble powder), a white powder containing a minimum of 90% active ingredient.

SYNONYMS: Rotam Methomyl 90SP Insecticide

CITATION: Kuhn, J. (1996). Methomyl 90% SP: Final Report: Acute Oral Toxicity Study in Rats. Laboratory Study No. 2918-96. Unpublished study prepared by Stillmeadow, Inc. September 5, 1996. Pp. 5-33 MRID 48226104.

SPONSOR: Rotam Agrochemical Company, Ltd
ChaiWan, Hong Kong

EXECUTIVE SUMMARY: In an acute oral toxicity study (MRID 48226104), groups of five male or five female HSD Sprague-Dawley albino rats (age [estimated from body weights]: 10-13 weeks; weight: males: 272-323 g; females: 178-218 g; source: Harlan Sprague Dawley, Inc., Indianapolis, IN) were orally gavaged with a 5% w/v concentration of the test material in deionized water. The test material doses ranged from 5.0 to 25.0 mg/kg. The volume administered ranged from 0.10 mL/kg at 5.0 mg/kg to 0.50 mL/kg at the 25.0 mg/kg level.

All deaths occurred within two hours of dosing. There were no deaths at 5.0 mg/kg (only females tested); 1/5 females dosed at 6.5 mg/kg died; 0/5 males at 8.0 mg/kg died; 5/5 females at 10.0 mg/kg died; 4/5 males at 17.0 mg/kg died; 5/5 females at 24.0 mg/kg died; and 5/5 males at 25.0 mg/kg died. Signs of toxicity were seen in all animals in all dose groups (except those dying within the first hour after dosing) and included piloerection, activity decrease, salivation, body tremors, sensitivity to sound, gasping, rapid breathing, polyuria, ptosis and muzzle stained red. Survivors recovered by Day 8.

Gross necropsy in rats that died showed matted muzzle (chin hair matted), clear or white liquid in the stomach, orange gel in small intestine, and green paste in large intestine. The surviving rats had no observable abnormalities.

Male rat LD₅₀ = 14.2 (11.0-18.4) mg/kg

Female rat LD₅₀ = 7.14 (6.22-8.19) mg/kg

Based on the acute oral LD₅₀ of 7.14 mg/kg, Methomyl 90% SP is in EPA Toxicity Category I for oral toxicity.

COMPLIANCE: Signed and dated GLP, Quality Assurance and [No] Data Confidentiality statements were provided.

RESULTS and DISCUSSION:

- A. **Mortality:** There were no deaths at 5.0 mg/kg (only females tested); 1/5 females dosed at 6.5 mg/kg died; 0/5 males at 8.0 mg/kg died; 5/5 females at 10.0 mg/kg died; 4/5 males at 17.0 mg/kg died; 5/5 females at 24.0 mg/kg died; and 5/5 males at 25.0 mg/kg died.
- B. **Clinical observations:** All deaths occurred within 2 hours of dosing. Signs of toxicity were seen in all animals in all dose groups (except those dying within one hour of dosing) and included piloerection, activity decrease, salivation, body tremors, sensitivity to sound, gasping, rapid breathing, polyuria, ptosis and muzzle stained red. Survivors recovered by Day 8.
- C. **Gross necropsy:** Necropsy findings in rats that died included matted muzzle (chin hair matted), clear or white liquid in the stomach, orange gel in small intestine, and green paste in large intestine. The surviving rats had no observable abnormalities.
- D. **Reviewer's conclusions:** We can accept the findings of this study as indicating the LD₅₀ value = 7.14 mg/kg in female rats and 14.2 mg/kg in male rats. Methomyl 90 SP is in EPA Toxicity Category I for oral toxicity.
- E. **Additional comment:** Since this study is from 1996, OECD 401: Acute Oral LD₅₀ was the protocol used. Although we accepted the study in this case, our guidance is that OECD 401 is now an unacceptable protocol. Please inform the registrant that the preferred protocol is OECD 425: Acute Oral Toxicity-Up-and-Down Procedure.

Reviewer: Byron T. Backus

Date: February 28, 2011

Risk Manager (EPA): 07

STUDY TYPE: Acute Dermal Toxicity – Rat; OPPTS 870.1200; OECD 402

TEST MATERIAL: Methomyl 90% SP (soluble powder), a fine white powder containing 91.12% active ingredient.

SYNONYMS: Rotam Methomyl 90SP Insecticide

CITATION: Kuhn, J. (1996). Methomyl 90% SP: Final Report: Acute Dermal Toxicity Study in Rabbits. Laboratory Study No. 2919-96. Unpublished study prepared by Stillmeadow, Inc. August 22, 1996. Pp. 34-49 MRID 48226104.

SPONSOR: Rotam Agrochemical Company, Ltd
ChaiWan, Hong Kong

EXECUTIVE SUMMARY: In an acute dermal toxicity study (MRID 48226104), five male and five female New Zealand young adult white rabbits (males: 2.050-2.700 kg; Females: 2.200-2.750 kg; source: Ray Nichols Rabbitry, Lumberton, TX) were dermally exposed to 5050 mg/kg Methomyl 90% SP, a white powder. Each dose was moistened with deionized water (0.57 mL/g of test material) and applied evenly to a clipped area (\geq 10% of the total body surface area) on the dorsal surface of the trunk. The site of application was covered with an 8 x 4 inch surgical gauze patch which was secured with non-irritating adhesive tape. The trunk of each animal was wrapped with an orthopedic stockinette. After 24 hours the wrappings were removed and the area was gently cleaned. The rabbits were observed for 14 days.

There were no deaths. The only sign of systemic toxicity was rapid breathing in two males and two females at one hour. There was very slight erythema at the application site in all rabbits on Day 1, and in two animals on Day 4. All rabbits gained weight between Day 0 and 7; one female lost a slight amount of weight between Day 7 and 14 while the other animals gained or maintained weight. At gross necropsy there were no observable abnormalities.

Dermal LD₅₀ Males > 5050 mg/kg bw
Dermal LD₅₀ Females > 5050 mg/kg bw
Dermal LD₅₀ Combined > 5050 mg/kg bw

Based on the acute dermal LD₅₀ > 5050 mg/kg, Methomyl 90% SP, a fine white powder containing 91.12% active, is in EPA Toxicity Category IV for dermal toxicity.

This study is classified as acceptable. It does satisfy the guideline requirements for an acute dermal study (OPPTS 870.1200; OECD 402) in the rabbit.

COMPLIANCE: Signed and dated GLP, Quality Assurance and [No] Data Confidentiality statements were provided.

RESULTS and DISCUSSION:

Dose (mg/kg bw)	Mortality/Number Tested		
	Males	Females	Combined
5050	0/5	0/5	0/10

- A. **Mortality:** There were no deaths.
- B. **Clinical observations:** The only sign of systemic toxicity was rapid breathing in two males and two females at one hour. There was very slight erythema at the application site in all rabbits on Day 1, and in two animals on Day 4. All rabbits gained weight between Day 0 and 7; one female lost a slight amount of weight between Day 7 and 14 while the other animals gained or maintained weight.
- C. **Gross necropsy:** At gross necropsy there were no observable abnormalities.
- D. **Reviewer's conclusions:** The acute dermal LD₅₀ for rabbit males, females (and the combined sexes) is greater than 5050 mg/kg bw. This places Methomyl 90% SP, a fine white powder containing 91.12% active, in EPA Toxicity Category IV for dermal toxicity.

STUDY TYPE: Acute Inhalation Toxicity – Rat; OPPTS 870.1300; OECD 403

TEST MATERIAL: Methomyl 90% SP (soluble powder), a fine white powder containing 91.12% active ingredient.

SYNONYMS: Rotam Methomyl 90SP Insecticide

CITATION: Bennick, J. (1996). Methomyl 90% SP: Final Report: Acute Inhalation Toxicity Study in Rats. Laboratory Study No. 2920-96. Unpublished study prepared by Stillmeadow, Inc. August 20, 1996. Pp. 107-133. MRID 48226104.

SPONSOR: Rotam Agrochemical Company, Ltd
ChaiWan, Hong Kong

EXECUTIVE SUMMARY: In an acute inhalation toxicity study (MRID 48226104) groups of five male and five female HSD:Sprague-Dawley albino young adult rats (M: 294-319 g; F: 192-226 g; source: Harlan Sprague Dawley, Inc., Indianapolis, IN) were exposed (nose-only) for 4 hours to atmospheric concentrations (analytically determined) of 0.114 and 0.299 mg/L Methomyl 90% SP; the Mean Mass Aerodynamic Diameter (MMAD) values were 1.175 and 3.224 μ m and the mean Geometric Standard Deviation (GSD) values were 4.367 and 4.373 respectively. There were only single measurements for atmospheric concentration, MMAD and GSD at 0.299 mg/L, as the study was ended at 2.5 hours into exposure when all animals were dead. The rats exposed to 0.114 mg/L were observed for 14 days following exposure.

All of the rats exposed to 0.299 mg/L were dead at 2 ½ hours into the scheduled 4-hour exposure. Signs of toxicity in one female at 1.0 hours into exposure (all the other 9 rats were dead at this time) included piloerection, extreme body tremors and moderate polyuria. There was no mortality among the rats exposed to 0.114 mg/L. Signs of toxicity during and immediately after exposure in the 0.114 mg/L group included polyuria, activity decrease, piloerection, red ocular discharge, body tremors, unsteady gait, withdrawn testes, nasal discharge, lacrimation, ptosis, fur coated with feces and/or urine, and crust around eyes. Some of these signs were still present on Day 1, but the only one still present on Day 2 was piloerection in 2 males. All rats in the lower exposure group were normal by Day 3 and showed no indications of toxicity for the remainder of the observation period; they all gained weight between Day 0 and 7 and again between Day 7 and 14.

Necropsy findings in the rats exposed to 0.299 mg/L included hair around mouth and nose and/or eyes matted and red or matted and foamy, ventral hair matted, and lungs swollen twice normal size and red. There were no observed abnormalities in the rats exposed to 0.114 mg/L.

LC₅₀ Males > 0.114 mg/L; < 0.299 mg/L
LC₅₀ Females > 0.114 mg/L; < 0.299 mg/L
LC₅₀ Combined > 0.114 mg/L; < 0.299 mg/L

Based on the four-hour inhalation exposure $0.114 \text{ mg/L} < \text{LC}_{50} < 0.299 \text{ mg/L}$, Methomyl 90% SP, a fine white powder containing 91.12% active ingredient, is in EPA Toxicity Category II by this exposure route.

This study is classified as acceptable. It does satisfy the guideline requirements for an acute inhalation study (OPPTS 870.1300; OECD 403) in the rat.

COMPLIANCE: Signed and dated GLP, Quality Assurance and [No] Data Confidentiality statements were provided.

RESULTS and DISCUSSION:

Nominal Conc. (mg/L)	Analytical Conc. (mg/L)	MMAD μm	Mean GSD	Mortality/Number Tested		
				Males	Females	Combined
0.272	0.114	1.175	4.367	0/5	0/5	0/10
0.806	0.299	3.224	4.373	5/5	5/5	10/10

Test atmosphere / Chamber description: From p. 114 of MRID 48226104: "The aerosol was generated by a Gem T Trost Air Mill which aspirated the test substance from a motorized revolving disc delivery system coupled to the mill. The concentrated aerosol was then diluted with filtered air and drawn into the exposure chamber. Air flow into the chamber was maintained through the use of a calibrated orifice plate at a rate of 18.3-20.4 air changes per hour..."

Mean Formulation Conc. (mg/L):	0.114	0.299
Chamber Volume (L):	500	500
Mean Airflow (L/min):	170	153
Range of Temperature ($^{\circ}\text{F}$):	70-73	70
Range of Relative Humidity (%):	73-78	77
Time to t_{99} equilibrium (minutes):	14	15

Test atmosphere concentration: From p. 115 of MRID 48226104: "The concentration of test substance in the exposure atmosphere (taken from the breathing zone of the animals) was determined analytically once per hour... The analytical determination was made using a BAUSCH & LOMB SPECTRONIC 2000 Spectrophotometer... The nominal concentration was determined by dividing the loss in weight of the test substance after each exposure by the total volume of air which passed through the chamber."

Particle size determination: Particle size distribution was measured twice during exposure using an 8-stage cascade impactor (only once at 0.299 mg/L, as all rats were dead at 2 ½ hours into exposure). The Mass Median Aerodynamic Diameter (MMAD) and particle size distributions were calculated from these data.

- A. **Mortality**: All of the rats exposed to 0.299 mg/L were dead at 2 ½ hours into the scheduled 4-hour exposure. There was no mortality among the rats exposed to 0.114 mg/L.
- B. **Clinical observations**: Signs of toxicity in one 0.299 mg/L female at 1.0 hours into exposure (the other 9 rats were dead at this time) included piloerection, extreme body tremors and moderate polyuria. Signs of toxicity during and immediately after exposure in the 0.114 mg/L group included polyuria, activity decrease, piloerection, red ocular discharge, body tremors, unsteady gait, withdrawn testes, nasal discharge, lacrimation, ptosis, fur coated with feces and/or urine, and crust around eyes. Some of these signs were still present on Day 1, but the only one still present on Day 2 was piloerection in 2 males. All rats in the lower exposure group were normal by Day 3 and showed no indications of toxicity for the remainder of the observation period; they all gained weight between Day 0 and 7 and again between Day 7 and 14.
- C. **Gross necropsy**: Necropsy findings in the rats exposed to 0.299 mg/L included hair around mouth and nose and/or eyes matted and red or matted and foamy, ventral hair matted, and lungs swollen twice normal size and red. There were no observed abnormalities in the rats exposed to 0.114 mg/L.
- D. **Reviewer's conclusions**: Based on the four-hour inhalation exposure 0.114 mg/L < LC₅₀ < 0.299 mg/L, Methomyl 90% SP, a fine white powder containing 91.12% active ingredient, is in EPA Toxicity Category II by this exposure route.

Reviewer: Byron T. Backus, Ph.D.
Risk Manager (EPA): 07

Date: March 9, 2011

STUDY TYPE: Primary Eye Irritation – Rabbit; OPPTS 870.2400; OECD 405

TEST MATERIAL: Methomyl 90% SP (soluble powder), a fine white powder containing 91.12% active ingredient.

SYNONYMS: Rotam Methomyl 90SP Insecticide

CITATION: Kuhn, J. (1996). Methomyl 90% SP: Final Report: Primary Eye Irritation Study in Rabbits. Laboratory Study No. 2921-96. Unpublished study prepared by Stillmeadow, Inc. August 7, 1996. Pp. 50-69 MRID 48226104.

SPONSOR: Rotam Agrochemical Company, Ltd
ChaiWan, Hong Kong

EXECUTIVE SUMMARY: In a primary eye irritation study (MRID 48217706), 0.05 mL (22.4 mg) of the test material was instilled into the conjunctival sac of the right eye of each of 6 (3M & 3F) albino New Zealand white rabbits (body weights: males: 2.025-3.200 kg; females: 2.850-3.050 kg; source: Ray Nichols Rabbitry, Lumberton, TX). It is presumed by this reviewer that the reason for using a dose of 0.05 mL instead of 0.1 mL is related to the toxicity of the test material; in a study with Methomyl Technical (MRID 48217706), containing 98.45% active, all 6 rabbits which had 0.1 mL of the test material instilled in one eye were dead within one hour. The eyes were evaluated and scored for irritation at 1, 24, 48 and 72 hours.

All 6 eyes were positive for iritis and conjunctival redness at 1 hour, and 5/6 were positive for corneal opacity. 4/6 were positive for corneal opacity at 24 hours. All eyes were completely clear (all scores zero) at 72 hours. The Maximum Mean Irritation Score was 25.7, observed at 1 hour after treatment.

In this study, 4/6 eyes were positive for corneal opacity at 24 hours. Methomyl 90% SP, a fine white powder containing 91.12% active ingredient, is in EPA Toxicity Category III for primary eye irritation. Because only 0.05 mL was instilled (presumably because of systemic toxicity considerations), eye protection is mandatory for workers with potential exposure to this formulation.

This study is classified as acceptable. It does satisfy the guideline requirements for a primary eye irritation study (OPPTS 870.2400; OECD 405) in the rabbit.

COMPLIANCE: Signed and dated GLP, Quality Assurance and Data Confidentiality statements were provided.

RESULTS and DISCUSSION:

Observations	Number of eyes positive/Number treated			
	Hours			
	1	24	48	72
Corneal Opacity	5/6	4/6	0/6	0/6
Iritis	6/6	0/6	0/6	0/6
Conjunctivae				
Redness*	6/6	0/6	0/6	0/6
Chemosis*	0/6	0/6	0/6	0/6
Discharge**	0/6	0/6	0/6	0/6

* Score of 2 or more required to be considered "positive"

** Discharge does not indicate a positive effect according to the grading scale

A. **Observations:** All 6 eyes were positive for iritis and conjunctival redness at 1 hour, and 5/6 were positive for corneal opacity. 4/6 were positive for corneal opacity at 24 hours. All eyes were completely clear (all scores zero) at 72 hours. The Maximum Mean Irritation Score was 25.7, observed at 1 hour after treatment.

B. **Results:** The Maximum Mean Total Score (MMTS) for the washed eyes was 25.7 at 1 hour.

C. **Reviewer's conclusions:** The test material can be classified in EPA Toxicity Category III for eye irritation. Because only 0.05 mL was instilled (presumably because of systemic toxicity considerations), eye protection is mandatory for workers with potential exposure to this formulation.

Reviewer: Byron T. Backus, Ph.D.

Date: March 10, 2011

Risk Manager (EPA): 07

STUDY TYPE: Primary Dermal Irritation – Rabbit; OPPTS 870.2500; OECD 404

TEST MATERIAL: Methomyl 90% SP (soluble powder), a fine white powder containing 91.12% active ingredient.

SYNONYMS: Rotam Methomyl 90SP Insecticide

CITATION: Kuhn, J. (1996). Methomyl 90% SP: Final Report: Primary Dermal Irritation Study in Rabbits. Laboratory Study No. 2922-96. Unpublished study prepared by Stillmeadow, Inc. August 15, 1996. Pp. 70-85 MRID 48226104.

SPONSOR: Rotam Agrochemical Company, Ltd
ChaiWan, Hong Kong

EXECUTIVE SUMMARY: In a primary dermal irritation study (MRID 48226104), six (3M & 3RF) young adult New Zealand white albino rabbits (males: 2.200-2.825 kg; females: 2.300-3.100 kg; source: Ray Nichols Rabbitry, Lumberton, TX) were each dermally exposed to 500 mg Methomyl 90% SP (91.12% active ingredient) moistened with a 0.3 mL deionized water. The application site was covered a semi-permeable dressing (a surgical gauze patch four single layers thick measuring 2.5 x 2.5 cm, covered with plastic film and secured with non-irritating adhesive tape, with the entire trunk of the animal wrapped in orthopedic stockinette) during the 4-hour exposure period. The sites were evaluated and scored for irritation at 1, 24, 48 and 72 hours and 7 days after removal of the dressing.

There is nothing in the report indicating there was any systemic toxicity. Erythema scores were 0 (1 rabbit), 1 (4 rabbits) and 2 (1 rabbit) at 1 hour; 0 (3 rabbits), 1 (2 rabbits) and 2 (1 rabbit) at 24 and 48 hours, and 0 (5 rabbits) and 1 (1 rabbit) at 72 hours. All erythema scores were zero on day 7. All edema scores were zero at all times. The Primary Dermal Irritation Index (PDII) = 0.63. The mean irritation score at 72 hours was 0.17.

In this study, Methomyl 90% SP (91.12% active ingredient) caused mild dermal irritation (PDII = 0.63) following 4-hour exposure. The mean irritation score at 72 hours was 0.17. The test material is classified in EPA Toxicity Category IV for primary dermal irritation.

This study is classified as acceptable. It does satisfy the guideline requirements for a primary dermal irritation study (OPPTS 870.2500; OECD 404) in the rabbit.

COMPLIANCE: Signed and dated GLP, Quality Assurance and [No] Data Confidentiality statements were provided.

RESULTS and DISCUSSION:

Animal Number	Sex	Hours			
		½-1	24	48	72
3164	Male	1/0 ^a	1/0	1/0	0/0
3270	Male	1/0	0/0	0/0	0/0
3272	Male	0/0	0/0	0/0	0/0
3165	Female	1/0	0/0	0/0	0/0
3275	Female	2/0	2/0	2/0	1/0
3277	Female	1/0	1/0	1/0	0/0
Severity of Irritation: Mean Score		1.00/0.00	0.67/0.00	0.67/0.00	0.17/0.00

^a erythema/edema.

- A. **Observations:** There is nothing in the report indicating there was any systemic toxicity. Erythema scores were 0 (1 rabbit), 1 (4 rabbits) and 2 (1 rabbit) at 1 hour; 0 (3 rabbits), 1 (2 rabbits) and 2 (1 rabbit) at 24 and 48 hours, and 0 (5 rabbits) and 1 (1 rabbit) at 72 hours. All erythema scores were zero on day 7. All edema scores were zero at all times.
- B. **Results:** The Primary Dermal Irritation Index (PDII, average of scores at 1, 24, 48 & 72 hours) = 0.63.
- C. **Reviewer's conclusions:** In this study, Methomyl 90% SP (91.12% active ingredient) caused mild dermal irritation (PDII = 0.63) following 4-hour exposure. The mean irritation score at 72 hours was 0.17. The test material is classified in EPA Toxicity Category IV for primary dermal irritation.

Reviewer: Byron T. Backus, Ph.D.

Date: March 10, 2011

Risk Manager (EPA): 07

STUDY TYPE: Dermal Sensitization – Guinea Pig; OPPTS 870.2600; OECD 406

TEST MATERIAL: Methomyl 90% SP (soluble powder), a fine white powder containing 91.12% active ingredient.

SYNONYMS: Rotam Methomyl 90SP Insecticide

CITATION: Kuhn, J. (1996). Methomyl 90% SP: Final Report: Dermal Sensitization Study in Guinea Pigs. Laboratory Study No. 2923-96. Unpublished study prepared by Stillmeadow, Inc. August 30, 1996. Pp. 86-106 MRID 48226104.

SPONSOR: Rotam Agrochemical Company, Ltd
Chai Wan, Hong Kong

EXECUTIVE SUMMARY: In a dermal sensitization study (MRID 48226104) with Methomyl 90% SP (91.12% active ingredient) 20 (10M & 10F) young adult (males: 433-498 g; females: 383-453 g; source: SASCO Inc., Madison WI) Hartley albino guinea pigs were tested according to the Buehler protocol. Ten (5M & 5F) guinea pigs were assigned to Group I, while the remaining 10 (5M & 5F) were assigned to Group II. Group II animals received a 6-hour once-a-week occluded dermal exposure on the left front quadrant to 400 mg of Methomyl 90% SP moistened with 0.2 mL deionized water over a period of 3 weeks. The same test site was used for all 3 induction exposures. Group I animals were not exposed during this period. After two weeks (on Day 29), all animals were challenged with 400 mg Methomyl 90% SP moistened with 0.2 mL water at a new test site on the right rear quadrant. The sites were scored at 24 and 48 hours following the first induction exposure, at 24 hours following the second and third induction treatment, and at 24 and 48 hours following challenge.

Two of ten guinea pigs in Group I (naïve control group) and one of ten in Group II scored 0.5 at 24 hours following challenge, and one Group I and one Group II animal scored 0.5 at 48 hours following challenge. All other challenge scores were zero.

The report includes the results of a positive control assay (Study Number 2741-96; completed May 3, 1996) with 1-Chloro-2,4-Dinitrobenzene (DNCB). For induction, 0.4 mL of a 1% w/w solution in 80% ethanol was used; for challenge, 0.4 mL of a 0.45% w/v solution in acetone. The results (10/10 previously induced, 0/10 naïve controls showing a positive response) were appropriate. This positive control study was completed on May 3, 1996; challenge treatment in the Methomyl 90% SP study was on July 17, 1996.

Based on the results of this study, Methomyl 90% SP (91.12% active ingredient) is not a dermal sensitizer.

This study is classified as Acceptable. It does satisfy the guideline requirements for a dermal sensitization study (OPPTS 870.2600; OECD 406) in the guinea pig.

COMPLIANCE: Signed and dated GLP, Quality Assurance and [No] Data Confidentiality statements were provided.

PROCEDURE:

- A. **Induction:** Group II guinea pigs (10M & 10F) received a 6-hour once-a-week occluded dermal exposure on the left front quadrant to 400 mg of Methomyl 90% SP moistened with 0.2 mL deionized water over a period of 3 weeks.
- B. **Challenge treatment:** After two weeks, all animals were challenged with 400 mg Methomyl 90% SP moistened with 0.2 mL water at a new test site on the right rear quadrant. The sites were scored at 24 and 48 hours following challenge.
- C. **Negative controls:** Group I guinea pigs (5M & 5F) were untreated during the induction period. They were challenged with 400 mg Methomyl 90% SP moistened with 0.2 mL water at the same time Group II guinea pigs were challenged. The sites were scored at 24 and 48 hours following challenge.

RESULTS and DISCUSSION:

- A. **Reactions and durations:** Two of ten guinea pigs in Group I (naïve control group) and one of ten in Group II scored 0.5 at 24 hours following challenge, and one Group I and one Group II animal scored 0.5 at 48 hours following challenge. All other challenge scores were zero.
- B. **Positive control:** The report includes the results of a positive control assay with 1-Chloro-2,4-Dinitrobenzene (DNCB). For induction, 0.4 mL of a 1% w/w solution in 80% ethanol was used; for challenge, 0.4 mL of a 0.45% w/v solution in acetone. The results (10/10 previously induced, 0/10 naïve controls showing a positive response) were appropriate. This positive control study was completed on May 3, 1996; challenge treatment in the Methomyl 90% SP study was on July 17, 2001.
- C. **Reviewer's conclusions:** Based on the results of this study, Methomyl 90% SP (91.12% active ingredient) is not a dermal sensitizer.

1. **DP BARCODE:** 383462
2. **PC CODE:** 090301 (Methomyl)
3. **CURRENT DATE:** March 10, 2011
4. **TEST MATERIAL:** Methomyl 90% SP (soluble powder), a fine white powder containing 91.12% active ingredient.

Study/Species/Lab Study # / Date	MRID	Results	Tox. Cat.	Core Grade
Acute oral toxicity/rat Stillmeadow Inc. Sugar Land, TX 77478 Study No. 2918-96 September 5, 1996	48226104 (pp. 5-33)	Male rat LD ₅₀ = 14.2 (11.0-18.4) mg/kg; Female rat LD ₅₀ = 7.14 (6.22-8.19) mg/kg.	I	A
Acute dermal toxicity/rabbit Stillmeadow Inc. Sugar Land, TX 77478 Study No. 2919-96 August 22, 1996	48226104 (pp. 34-49)	LD ₅₀ Males > 5050 mg/kg bw LD ₅₀ Females > 5050 mg/kg bw LD ₅₀ Combined > 5050 mg/kg bw	IV	A
Acute inhalation toxicity/rat Stillmeadow Inc. Sugar Land, TX 77478 Study No. 2920-96 August 20, 1996	48226104 (pp. 107-133)	LC ₅₀ Males > 0.114 mg/L; < 0.299 mg/L LC ₅₀ Females > 0.114 mg/L; < 0.299 mg/L	II	A
Primary eye irritation/rabbit Stillmeadow Inc. Sugar Land, TX 77478 Study No. 2921-96 August 7, 1996	48226104 (Pp. 50-69)	0.05 mL instilled. 4/6 eyes positive for corneal opacity at 24 hours, all eyes completely clear by 72 hrs. Because only 0.05 mL was instilled, eye protection is mandatory.	III	A
Primary dermal irritation/rabbit Stillmeadow Inc. Sugar Land, TX 77478 Study No. 2922-96 August 15, 1996	48226104 (Pp. 70-85)	PDII = 0.63 Mean irritation score at 72 hrs = 0.17.	IV	A
Dermal sensitization/guinea pig Stillmeadow Inc. Sugar Land, TX 77478 Study No. 2923-96 August 30, 1996	48226104 (Pp. 86-106)	Negative	Neg.	A

Core Grade Key: A = Acceptable, S = Supplementary, U = Unacceptable, W = Waived



RE: methomyl 83100: few quick corrections and we'll be done

Frank Sobotka o Thomas Harris

04/05/2011 03:26 PM

Revised labels per your comments.

Dr. Frank E. Sobotka, Senior Partner
IPM Resources LLC
4032 Crockers Lake Blvd.
Suite 818
Sarasota, FL 34238
PH: 215 497-9501
FX: 215 497-9502

> Subject: methomyl 83100: few quick corrections and we'll be done

> To: [REDACTED]

> From: harris.thomas@epamail.epa.gov

> Date: Tue, 5 Apr 2011 13:58:34 -0400

Personal privacy information

> Dr. Sobotka,

> Almost there. Just a couple of quick things. Just email me back the
> labels. I'll wrap them up when I get back from a meeting at 3pm.

> 83100-ET

> DFU/crop table - a) Pull down bottom line on header (it's obscuring
> the units) and b) repeat header row on all pages.

> 83100-EI

> Precautionary/PPE, pp 4, 37 (two occurrences) - Respirator not quite
> right.

> a) Delete "For exposure in enclosed areas:"

> b) Delete last sentence "Dust/mist filtering respirator"

> In the label filenames just put a "b" right after the date but before
> the period. This will distinguish the label from this morning's
> version.

> Tom Harris

> EPA/OCSPP/OPP/RD/IRB

> voice: (703) 308-9423

> fax: (703) 308-0029


> harris.thomas@epa.gov

> visit <http://www.epa.gov/pesticides>



> 083100-0027.20110405b.Primary Lbl.pdf 083100-0028.20110405b.Primary Lbl.pdf



methomyl 83100: few quick corrections and we'll be done 

Thomas Harris o Frank Sobotka

04/05/2011 01:58 PM

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RESTRICTED USE PESTICIDE

Due to High Acute Toxicity to Humans

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

GROUP

1A

INSECTICIDE

Rotam Methomyl 90SP Insecticide In Water Soluble Packets

Active Ingredient	By Weight
Methomyl (S-methyl-N-[(methylcarbamoyl) oxy]thioacetimidate)	90%
Other Ingredients	10%
TOTAL	100%

*revisions required 4/5/11 1:58 PM
see email*

EPA Reg. No. 83100 - 28

EPA Est. No.: 69821-CHN-005

KEEP OUT OF REACH OF CHILDREN

DANGER

POISON



PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See additional Precautionary Statements on inside booklet and back panel of container and Directions for Use on inside booklet.

Manufactured by:
Rotam Agrochemical Company Ltd.
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong
1-866-927-6826

Net Contents:
Packets/Container
TBA

RESTRICTED USE PESTICIDE**Due to High Acute Toxicity to Humans**

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GROUP 1A INSECTICIDE

Rotam Methomyl 90SP Insecticide

In Water Soluble Packets

<u>Active Ingredient</u>	<u>By Weight</u>
Methomyl	
(S-methyl-N-[(methylcarbamoyl)oxy]thioacetimidate)	90%
<u>Other Ingredients</u>	10%
TOTAL	100%

EPA Reg. No. 83100 - 28

EPA Est. No.: 69821-CHN-005

Manufactured by:
Rotam Agrochemical Company Ltd.
7/F Cheung Tat Centre
18 Cheung Lee Street
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1-866-927-6826

Net Contents:
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KEEP OUT OF REACH OF CHILDREN
DANGER POISON

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Refer to inside label booklet for additional precautionary information including Personal Protective Equipment (PPE), User Safety Recommendations, Engineering Controls Statements, Environmental Hazards and Directions For Use.

FIRST AID

(N-Methyl Carbamate insecticide)

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

ATROPINE IS AN ANTIDOTE --SEEK MEDICAL ATTENTION AT ONCE IN ALL CASES OF SUSPECTED POISONING.

If poisoning symptoms appear (see POISONING SYMPTOMS), get medical attention.

POISONING SYMPTOMS — Methomyl poisoning produces effects associated with anticholinesterase activity which may include weakness, blurred vision, headache, nausea, abdominal cramps, discomfort in the chest, constriction of pupils, sweating, slow pulse, muscle tremors. If poisoning symptoms appear, refer to First Aid section and seek medical attention at once.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

TREATMENT — Atropine sulfate should be used for treatment. Administer repeated doses, 1.2 to 2.0 mg. intravenously every 10 to 30 minutes until full atropinization is achieved. Maintain atropinization until the patient recovers. Artificial respiration or oxygen may be necessary. Allow no further exposure to any cholinesterase inhibitor until recovery is assured.

Do not use 2-PAM for exposure to ROTAM METHOMYL 90SP alone. However, for exposure to combinations of ROTAM METHOMYL 90SP and organophosphorous insecticides, 2-PAM may be used as required to supplement the atropine sulfate treatment. Do not use morphine.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

You may also contact the National Poison Control Center 24-hr Emergency Hotline at: 1-800-222-1222.

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS
AND DOMESTIC ANIMALS
KEEP OUT OF REACH OF CHILDREN
DANGER POISON



PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

Restricted Use Pesticide due to toxicity categories. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

Fatal if swallowed. May be fatal if inhaled or gets in eyes. Do not breathe dust. Do not get in eyes. Avoid contact with clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, loaders, applicators, cleaners, repairers of application equipment, and others exposed to the concentrate must wear:

- Long sleeve shirt and long pants.
- Chemical-resistant gloves, such as barrier laminate or butyl rubber.
- Socks and chemical resistant footwear.
- Protective eyewear.
- Chemical resistant apron.

~~For exposures in enclosed areas:~~ Respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or a canister with any R, P, or HE prefilter.

~~Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any R, P, or HE prefilter.~~

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry

ENGINEERING CONTROL STATEMENTS

Human flaggers must be in enclosed cabs.

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR part 170.240 (d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

The enclosed cabs must be used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR part 170.240 (d)(4-6)]. The

handler PPE requirements may be reduced or modified as specified in the WPS.

Water soluble packets when used correctly qualify as a closed loading system under the WPS. Handlers handling this product while it is enclosed in intact water-soluble packets are permitted to wear long-sleeved shirt, long pants, shoes plus socks, chemical-resistant gloves, and chemical-resistant apron, provided the other required PPE is immediately available in case the bag is opened.

Pilots must not assist in the mixing and loading operations.

USER SAFETY RECOMMENDATIONS

USERS SHOULD:

- Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove personal protective equipment immediately after handling this product.
- Wash the outside of gloves before removing.
- As soon as possible, wash thoroughly and change into clean clothing.
- Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, and mammals. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high-water mark. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area. This chemical is known to leach through soil into groundwater under certain conditions as a result of label use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

This chemical can contaminate surface water through spray drift. Under some conditions, it may also have a high potential for runoff into surface water for several days to weeks after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, and areas overlaying extremely shallow groundwater, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas over-laying tile drainage systems that drain to surface water.

PHYSICAL AND CHEMICAL HAZARDS

Keep container closed. Use with adequate ventilation.

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DIRECTIONS FOR USE

Restricted Use Pesticide

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI). REI Summary: REI peaches = 4 day; REI apple, cotton, grapefruit, lemon, nectarine, orange, tangelo, tangerine = 3 day; all other WPS uses = 48 hour REI.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical Resistant Gloves Category A (such as butyl rubber, natural rubber, neoprene rubber or nitrile rubber), all >14 mils
- Shoes plus socks
- Protective eyewear

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

Do not formulate this product into other End-use products without written permission from Rotam.

Do not apply thru Drip Chemigation unless accompanied by Rotam Supplemental Labeling.

ROTAM METHOMYL 90SP insecticide should be used only in accordance with directions for use on this label or in separate Rotam supplemental labeling. Rotam will not be responsible for use of the product in a manner not specified by Rotam in the product's labeling and User assumes all risk for such use.

ROTAM METHOMYL 90SP is a dry powder to be dissolved in water for application by mechanical ground, overhead sprinkler, or aerial application Hand-

held equipment is prohibited for application to crops.

Do not apply by ground equipment within 25 feet, or by air within 100 feet of lakes, reservoirs, rivers, estuaries, commercial fish ponds and natural, permanent streams, marshes or natural, permanent ponds. Increase the buffer zone to 450 feet from the above aquatic areas when ultra low volume application is made.

Pilots must not assist in the mixing and loading operations.

Use only in commercial and farm plantings. Not for use in home plantings. Not for use during any period after a commercial crop site is opened for public entry as a "U-Pick", "Pick Your Own" or similar operation; in no case shall preharvest applications be made after first public entry. The restricted entry interval and preharvest interval for the crop stated elsewhere on this label must be followed.

RESISTANCE MANAGEMENT

For resistance management, ROTAM METHOMYL 90SP insecticide is a group 1A insecticide. Repeated and exclusive use of ROTAM METHOMYL 90SP or other group 1A insecticides may lead to the build-up of resistant strains of insects in some crops. Not all members of this group have been shown to be cross-resistant. Different resistance mechanisms that are not linked to target site of action, such as enhanced metabolism, are common for this group of chemicals. Alternation of compounds from different sub-groups within this group may be an acceptable part of an integrated pest management program.

Some insects are known to develop resistance to products used repeatedly for control. When this occurs, the recommended dosages fail to suppress the pest population below the economic threshold. Because the development of resistance cannot be predicted, the use of this product should conform to resistance management strategies established for the use area. These strategies may include incorporation of cultural and biological control practices, alternation of active classes of insecticides on succeeding generations and targeting the most susceptible life stage. Consult your local or state agricultural authorities for details.

If resistance to this product develops in your area, this product, or other products with a similar mode of action, may not provide adequate control. If poor performance cannot be attributed to improper application or extreme weather conditions, a resistant strain of insect may be present. If you experience difficulty with control and resistance is a reasonable cause, immediately consult your local company representative or agricultural advisor for the best alternative method of control for your area. For additional information on insect resistance monitoring, visit the Insecticide Resistance Action Committee (IRAC) on the web at <http://www.irac-online.org>.

INTEGRATED PEST MANAGEMENT

This product should be used as part of an Integrated Pest Management (IPM) program which can include biological, cultural, and genetic practices aimed at preventing economic pest damage. Application of this product should be based on IPM principles and practices including field scouting or other detection methods, correct target pest identification, population monitoring, and treating when target pest populations reach locally determined action thresholds. Consult your state cooperative extension service, professional consultants or other qualified authorities to determine appropriate action treatment threshold levels for treating specific pest/crop systems in your area.

SCOUTING

Monitor insect populations to determine whether or not there is a need for application of ROTAM METHOMYL 90SP based on locally determined economic thresholds. More than one treatment of ROTAM METHOMYL 90SP may be required to control a population of pests.

BENEFICIAL ANTHROPODS

ROTAM METHOMYL 90SP at rates of 1/8 to 1/4 lb. per acre helps conserve certain beneficials, including big-eyed bugs, damsel bugs, flower bugs and spiders in cotton and soybeans. While these beneficials cannot be relied upon to control pests, they are of potential value and should be monitored along with pests in pest management programs on these crops.

SPRAY PREPARATION

Spray equipment must be clean and free of previous pesticide deposits before applying ROTAM METHOMYL 90SP.

Fill spray tank 1/4 to 1/2 full of water. Add ROTAM METHOMYL 90SP directly to spray tank. Carefully open the outer barrier bag containing ROTAM METHOMYL 90SP in a water soluble bag. Do not cut open the outer barrier bag. Invert the outer barrier bag allowing the inner water soluble bag to fall directly into the spray tank. Do not allow packets to become wet prior to adding to the spray tank. Do not handle, open, rip, tear, cut or perforate the inner water soluble bag. Mix thoroughly to fully dissolve the insecticide; once dissolved continued agitation is not required. Use mechanical or hydraulic means; do not use air agitation. Be sure the soluble packet is completely dissolved before adding any other ingredients. Spray mix should not be stored overnight in spray tank.

Compatibility: Since formulations may be changed and new ones introduced, it is recommended that users premix a small quantity of a desired tank mix and observe for possible adverse changes (settling out, flocculation, etc.). Avoid mixtures of several materials and very concentrated spray mixtures.

Do not use ROTAM METHOMYL 90SP with Bordeaux mixture (copper sulfate and hydrated lime), "Du Ter" (triphenyltin hydroxide), lime sulfur, "Rayplex" iron nor in highly alkaline solutions. Use mildly alkaline mixtures immediately after mixing to prevent loss of insecticidal activity.

Tank-mix solutions containing Boron may affect solubility of the water soluble film. When using Boron containing solutions in a tank-mix, follow these procedures:

- Add the correct amount of ROTAM METHOMYL 90SP water soluble packets first
- Be sure the soluble packets are completely dissolved
- Introduce Boron containing solutions last

If the above procedure cannot be followed, and Boron is an essential part of the spray mix, substitute ROTAM METHOMYL 29LV formulation for the water soluble packets.

Tank Mix Sequence: Add different formulation types in the sequence indicated below. Allow time for complete mixing and dispersion after addition of each product.

1. ROTAM METHOMYL 90SP and other products in water soluble bags.
2. Water dispersible granules
3. Wettable powders
4. Water based suspension concentrates
5. Water soluble concentrates

6. Oil based suspension concentrates
7. Emulsifiable concentrates
8. Adjuvants, surfactants, oils
9. Soluble fertilizers
10. Drift retardants

Follow local practice and manufacturer's recommendation.

APPLICATION

Apply at the recommended rates when insect populations reach locally determined economic thresholds. Consult the cooperative extension service, professional consultants or other qualified authorities to determine appropriate threshold levels for treatment in your area.

Follow-up treatments of ROTAM METHOMYL 90SP should be applied, as needed, to keep pest populations within threshold limits. On most crops, ROTAM METHOMYL 90SP should be applied at 5 to 7 day intervals to maintain control. Refer to crop specific directions for use in the crop tables for more specific information on treatment intervals.

Use sufficient water to obtain thorough, uniform coverage. Since ROTAM METHOMYL 90SP is a fast acting contact insecticide, best results follow direct spraying of the target insect.

For aerial, use a minimum of 2 gals. per acre (gpa) except 10 gpa for peaches and nectarines; 15 gpa for oranges, lemons, grapefruit, tangelos and tangerines.

For certain crops a minimum of 1 gallon per acre may be used providing the following conditions are met:

- equipment is adjusted to distribute spray uniformly over the spray swath,
- wind conditions and other factors such as temperature and humidity are such that the spray is delivered to the target area,
- local regulations do not prohibit low-volume aerial sprays,
- use rates are applied as directed on the package label or supplemental labeling for the following crops:

Alfalfa	Celery	Peas (succulent)
Anise	Collards	Peppermint
Asparagus	Corn	Peppers
Barley	Cotton	Potato
Beans	Cucumber	Rye
Broccoli	Lettuce	Soybean
Brussels sprouts	Melons	Spinach
Cabbage	Mint	Sugar beet
Carrot	Oats	Summer Squash
Cauliflower	Peanuts	Wheat

Apply the low rates on small plants, small insects and light infestations of insects. Use intermediate rates on large insects and heavier infestations of insects. Use 1 to 3 applications of the highest recommended rate for controlling severe infestations. Thereafter, use the lowest rate possible to maintain control.

SPRAY TANK CLEANOUT

Immediately following application, thoroughly clean all spray equipment to reduce the risk of forming hardened deposits which might become difficult to remove.

Drain spray equipment. Thoroughly rinse sprayer and flush hoses, boom and nozzles with clean water.

Clean all other associated application equipment. Take necessary safety precautions when cleaning equipment. Do not clean near wells, water sources or desirable vegetation. Dispose of waste rinse water in accordance with local regulations.

CHEMIGATION

Instructions for the Use of ROTAM METHOMYL 90SP on Alfalfa, Barley, Oats, Green and Dry Bulb Onions, Potatoes, Rye, Sugar Beets and Wheat Using Overhead Sprinkler Chemigation

Do not apply thru Drip Chemigation unless accompanied by Rotam Supplemental Labeling.

Chemigation: Overhead sprinkler chemigation is allowed for use in alfalfa, barley, oats, onions, potatoes, rye, sugar beets, and wheat. Refer to supplemental, or Special Local Need (SLN) labeling or the crop specific sections of this label for use directions for chemigation. Do not apply this product through any other type of irrigation systems, except those allowed by instructions provided in a supplemental, SLN or this product label.

Overhead chemigation applications offer the advantage of greater penetration and coverage of the target plant. However, typical chemigation applications are more dilute than ground or aerial applications. For best results, it is recommended to keep the concentration of ROTAM METHOMYL 90SP as high as possible in the application. Apply ROTAM METHOMYL 90SP in 0.1 to 0.2 inches of water per acre. ROTAM METHOMYL 90SP is most active as a contact insecticide, although it does also have activity via ingestion of treated plants. For best results, applications of ROTAM METHOMYL 90SP should take place when the insects are active and most likely to come into direct contact with the application.

Types of Irrigation Systems

ROTAM METHOMYL 90SP may be applied through overhead sprinkler irrigation systems for control of various pests. Center pivot and lateral move irrigation systems are preferred. Other overhead sprinkler systems; such as end tow, side (wheel) roll and solid set, may be used if they provide uniform water distribution. Do not use filter screens smaller than 50 mesh throughout the system, due to possible build up of material on 100 mesh or smaller screens. Do not apply ROTAM METHOMYL 90SP through any other type of irrigation systems, except those allowed by instructions provided in a supplemental, SLN, or this product label.

General Directions for Chemigation

Preparation

A pesticide tank is recommended for the application of ROTAM METHOMYL 90SP in chemigation systems. Thoroughly clean the injection system and tank of any fertilizer or chemical residues using a standard clean-out procedure. Dispose of any residues in accordance with State and Federal laws. Add 1/4 to 1/2 of the desired amount of water and then measure the required amount of ROTAM METHOMYL 90SP into the tank. Complete filling the tank by adding the required amount of water. Agitate thoroughly to insure a uniform solution of ROTAM METHOMYL 90SP. Once in solution, no further agitation is required. Injection solution should not be stored overnight. Highly alkaline water should be buffered so that the pH of the spray solution is in the range of neutral to slightly acidic (pH5-7)

Injection into Chemigation Systems

Inject the proper amount of the ROTAM METHOMYL 90SP solution to the irrigation water flow using a positive displacement injection pump. Injection should occur at a point in the main irrigation water flow to ensure thorough mixing with the irrigation water. For continuously moving systems, inject the solution containing ROTAM METHOMYL 90SP into the irrigation water line continually and uniformly throughout the irrigation cycle. Apply in no more than 0.2 inches of water per acre. For overhead sprinkler systems that are stationary, add the solution containing ROTAM METHOMYL 90SP to the irrigation water line, and apply no more than 0.2 inches of water per acre, just before the end of the irrigation cycle.

Uniform Water Distribution

The irrigation system used for application of ROTAM METHOMYL 90SP must provide for uniform distribution of ROTAM METHOMYL 90SP treated water. Non-uniform distribution might result in crop injury, lack of effectiveness or illegal pesticide residues in or on the crop being treated. Ensure the irrigation system is calibrated to uniformly distribute the chemigation application to the crop. Contact the equipment manufacturer, the local University Extension agent or other experts if you have questions about achieving uniform distribution of the application.

Equipment Calibration

Calibrate the irrigation system and injector before applying ROTAM METHOMYL 90SP. Calibrate the injection pump while the system is running using the expected irrigation rate. If you have questions about calibration, you should contact your state extension service specialists, equipment manufacturer or other experts.

Monitoring of Chemigation Applications

A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of a responsible person, shall shut the system down and make necessary adjustments should the need arise. Wear the personal protective equipment as defined in the PPE section of the label for cleaners and repairers of application equipment when making adjustments or repairs on the chemigation system when ROTAM METHOMYL 90SP is in the irrigation water.

Required System Safety Devices

Do not connect any irrigation system used for pesticide applications to a public water system unless the pesticide label-prescribed safety devices are in place. Public water system means a system for the provision to the public of piped water for human consumption, if such a system has at least 15 service connections or regularly serves an average of at least 25 individuals at least 60 days out of the year.

1. The system must contain a functional check valve, vacuum relief valve and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.
2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut

off the pesticide into the pump when the water pump motor stops.

5. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.

6. Systems must use a metering pump such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

7. Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, backflow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, the water from the public water system should be discharged into a reservoir tank prior to pesticide introduction.

There shall be a complete physical break (air gap) between the outlet end of the fill pipe and the top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.

Posting of Areas to be Treated

Posting of areas to be chemigated is required when 1) any part of a treated area is within 300 feet of sensitive areas such as residential areas, labor camps, businesses, daycare centers, hospitals, in-patient clinics, nursing homes, or any other public areas such as schools, parks, playgrounds, or other public facilities not including public roads, or 2) when the chemigated area is open to the public such as golf courses or retail greenhouses.

Posting must conform to all the following requirements. Treated areas shall be posted with signs at all usual points of entry and along likely routes of approach from the listed sensitive areas. When there are no usual points of entry, signs must be posted in the corners of the treated areas and in any other location affording maximum visibility to sensitive areas. The signs shall be printed in ENGLISH. Signs must be posted prior to application and must remain posted until foliage has dried and soil surface water has disappeared. Signs may remain in place indefinitely as long as they are composed of materials to prevent deterioration and maintain legibility for the duration of the posting period.

All words shall consist of letters at least 2 1/2 inches tall, and all letters and the symbol shall be a color, which sharply contrasts with their immediate background. At the top of the sign shall be the words "KEEP OUT", followed by an octagonal stop sign symbol at least 8 inches in diameter containing the word "STOP". Below the symbol shall be the words "PESTICIDE IN IRRIGATED WATER". Posting for chemigation does not replace other posting and reentry requirements for farm worker safety.

Operation

Start the water pump and sprinkler, and let the system achieve the desired pressure and speed before starting the injector. Start the injector and calibrate the injection system according to the directions above. This procedure is necessary to deliver the desired rate per acre in a uniform manner. Apply ROTAM METHOMYL 90SP in 0.1 to 0.2 inches of water per acre. When the application is finished, allow the entire irrigation and injector system to be thoroughly flushed clean before stopping the system. End guns must be turned off during the application, if they irrigate nontarget areas or if they do not provide uniform application and coverage.

It is recommended that nozzles in the immediate area of control panels, chemical supply tanks, wellheads and system safety devices be plugged to prevent contamination of these areas.

Do not apply when wind speed favors drift beyond the area intended for treatment.

Do not apply when system connections or fittings leak or when nozzles do not provide uniform distribution.

Cleaning the System

Thoroughly clean the injection system and tank of any fertilizer or chemical residues using a standard clean-out procedure. Dispose of any residues in accordance with State and Federal laws. Consult your owner's manual or your local equipment dealer for cleanout procedures for your injection system.

SPRAY DRIFT MANAGEMENT

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops. These requirements do not apply to forestry applications, public health uses or to applications using dry formulations.

1. The distance of the outer most nozzles on the boom must not exceed 3/4 the length of the wingspan or rotor.
2. Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

Where states have more stringent regulations, they should be observed. The applicator should be familiar with and take into account the information covered in the Aerial Drift Reduction Advisory Information.

AERIAL DRIFT REDUCTION ADVISORY INFORMATION

Importance of Droplet Size

The most effective way to reduce drift potential is to apply large droplets (>150 - 200 microns). The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. The presence of sensitive species nearby, the environmental conditions, and pest pressure may affect how an applicator balances drift control and coverage. **APPLYING LARGER DROPLETS REDUCES DRIFT POTENTIAL, BUT WILL NOT PREVENT DRIFT IF APPLICATIONS ARE MADE IMPROPERLY OR UNDER UNFAVORABLE ENVIRONMENTAL CONDITIONS! See WIND, TEMPERATURE AND HUMIDITY, and TEMPERATURE INVERSIONS sections of this label.**

Controlling Droplet Size – General Techniques

- **Volume** - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- **Pressure** - Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types lower pressure produces larger droplets. Use the lower spray pressures recommended for the nozzle. Higher pressure reduces droplet size and does not improve canopy penetration. **WHEN HIGHER FLOW RATES ARE NEEDED, USE A HIGHER-CAPACITY NOZZLE INSTEAD OF INCREASING PRESSURE.**
- **Nozzle Type** - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

Controlling Droplet Size – Aircraft

- **Number of Nozzles** - Use the minimum number of nozzles that provide uniform coverage.
- **Nozzle Orientation** - Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
- **Nozzle Type** - Solid stream nozzles (such as disc and core with swirl plate removed) oriented straight back produce larger droplets than other nozzle types and the lowest drift.
- **Boom Length** - For some use patterns, reducing the effective boom length to less than 3/4 of the wingspan or rotor length may further reduce drift without reducing swath width.
- **Application Height** - Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.
- **Swath Adjustment** - When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downward edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.)

BOOM HEIGHT

Setting the boom at the lowest labeled height (if specified) which provides uniform coverage reduces the exposure of droplets to evaporation and wind. For ground equipment, the boom should remain level with the crop and have minimal bounce.

WIND

Drift potential is lowest between wind speeds of 3-10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 3 mph due to variable wind direction and high inversion potential. **AVOID GUSTY OR WINDLESS CONDITIONS.**

Note: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

TEMPERATURE AND HUMIDITY

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

TEMPERATURE INVERSIONS

Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain close to the ground and move laterally in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly

dissipates indicate good vertical air mixing.

SENSITIVE AREAS

The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from the sensitive areas).

SHIELDED SPRAYERS

Shielding the boom or individual nozzles can reduce the effects of wind. However, it is the responsibility of the applicator to verify that the shields are preventing drift and not interfering with uniform deposition of the product.

AIR ASSISTED (AIR BLAST) FIELD CROP SPRAYERS

Air assisted field crop sprayers carry droplets to the target via a downward directed air stream. Some may reduce the potential for drift, but if a sprayer is unsuitable for the application and/or set up improperly, high drift potential can result. It is the responsibility of the applicator to determine that a sprayer is suitable for the intended application, is configured properly, and that drift is not occurring.

Note: Air assisted field sprayers can affect product performance by affecting spray coverage and canopy penetration. Consult the application equipment section of this label to determine if use of an air assisted sprayer is recommended.

AIR ASSISTED (AIR BLAST) TREE AND VINE SPRAYERS

Air assisted tree and vine sprayers carry droplets into the canopy of trees and vines via a radially or laterally directed air stream. These sprayers are not suitable for applying herbicides. In addition to the general drift management principles already described, the following specific practices will further reduce the potential for drift:

Adjust deflectors and aiming devices so that spray is only directed into the canopy.

Block off upward pointed nozzles when there is no overhanging canopy.

Use only enough air volume to penetrate the canopy and provide good coverage.

Do not allow spray to go beyond the edge of the cultivated area. Spray the outside row only from outside the planting.

CROP AND RATE CHARTS

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Alfalfa	Pea Aphid Lygus Bugs Blotch Leafminer Aphids Egyptian Alfalfa Weevil Larvae Loopers Beet Armyworm Armyworm Alfalfa Caterpillar Fall Armyworm Western Yellowstriped Armyworm Yellowstriped Armyworm	1/2 – 1	7 *	48 hrs
	Alfalfa Weevil Larvae	1		
	Variegated Cutworm	1/4 - 1		
	Do not apply to dormant or semi-dormant alfalfa when min. daily temp. is 50° F, or lower. Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. * Do not apply within 7 days of cutting or allowing livestock to graze.			
Anise (Fennel)	Cabbage Looper	1	7.	48 hrs
	Beet Armyworm	1/2 - 1		
Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop				
Apple(Ground application only)	Apple Aphid Rosy Apple Aphid Tufted Apple Budmoth Green Fruitworm Tarnished Plant Bug	1/2 - 1 *	14	72 hrs
	Codling Moth (10-12 day spray intervals)			
	Leafrollers (Fruit-tree, Obliquebanded, Redbanded, Variegated) Lesser Appleworm White Apple Leafhopper Tentiform Leafminer Cutworm	1 *		
Do not use on Early Macintosh & Wealthy varieties Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 5 applications per crop; minimum interval between treatments is 7 days. * Apply in a minimum of 50 gallons of water per acre.				

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Asparagus	Beet Armyworm, Western Yellowstriped Armyworm Asparagus Beetle Spotted Asparagus Beetle White Cutworm Redbacked Cutworm	1/2 - 1	1	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Avocado	Western Avocado Leafroller Omnivorous Looper	1/2 - 1	1	48 hrs
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Barley	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).			
Beans (Succulent) Including: Kidney, Lima, Mung, Navy, Pinto, Snap, Wax, Broad, Fava, Asparagus, Blackeyed peas Cowpeas, Chick peas, Garbanzo beans, Sweet lupine, White sweet lupine White lupine,	Leafhopper Mexican Bean Beetle	1/4 - 1	Succulent Beans 1/4 - 1/2 lb.— 1, over 1/2 lb. -- 3; 3 Vines 7 Hay	48 hrs
	Fall Armyworm Variegated Cutworm	1/2		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Grain lupine	Beet Armyworm Corn Earworm Saltmarsh Caterpillar, Yellowstriped Armyworm Western Yellowstriped Armyworm, Lygus Bugs Thrips Aphids Loopers*	1/2 – 1		
	European Corn Borer (Ovicide & Larvicide)-- Initiate when moth flights first appear and-continue preventive treatments at 3-4 day intervals to control eggs and larvae			
	Spotted Cucumber Beetle	1/4 – 1/2		
	Succulent Beans - Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. * Do not use for Loopers in AL & GA.			
	Beans (Dry) (Follow Beans, Succulent)	(Follow Beans, Succulent)	(Follow Beans, Succulent)	14 - Dry Beans * 14 - Vines * 14 - Hay *
		Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting.		
Beets (Table)	Imported Cabbageworm	1/4 - 1	0 - roots 10 - tops	48 hrs
	Beet Armyworm Cabbage Looper Diamondback Moth	1/2 - 1		
	Cucumber Beetle Variegated Cutworm	1/2		
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Bermudagrass pasture	Fall Armyworm Armyworm Striped Grass Looper	1/4 - 1	7 - Forage * 3 - Dehydrated Hay **	48 hrs
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. * Do not apply within 7 days of feeding forage or allowing livestock to graze. ** Do not apply within 3 days of cutting for hay.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Blueberries	Blueberry Leafhopper Aphids Tussock Moth Weevil Sharp-Nosed Leafhopper	1/2	3	48 hrs
	Cranberry Fruitworm* Cherry Fruitworm*	1/2 - 1		
	Flea Beetle (larvae) Sawfly (larvae) Blueberry Leafroller	1		
	Blueberry Maggot	1/4 - 1/2		
	Do not apply during bloom. Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than applications per crop. * For ground use only.			
	Broccoli	Loopers, Diamondback Moth	1/2 - 1 **	
Imported Cabbageworm	1/4 - 1 **			
Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. ** Add a wetting agent to improve coverage.				
Brussels Sprouts	Loopers Imported Cabbageworm, Diamondback Moth	1/2 - 1 **	3	48 hrs
	Variegated Cutworm	1/2 **		
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. ** Add a wetting agent to improve coverage			
Cabbage	Loopers * Diamondback Moth Fall Armyworm	1/2 - 1 **	1	48 hrs
	Imported Cabbageworm	1/4 - 1 **		
	Variegated Cutworm	1/2 **		
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 15 applications per crop; minimum interval between treatments is 2 days. * Do not use for Loopers in AL & GA. ** Add a wetting agent to improve coverage			
Carrot	Beet Armyworm Armyworms Aster Leafhopper	1/2 - 1	1	48 hrs
	Variegated Cutworm	1/4 - 1/2		
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Cauliflower	Imported Cabbageworm	1/4 - 1 **	3	48 hrs
	Loopers Diamondback Moth	1/2 - 1 **		
	Variegated Cutworm	1/2 **		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. ** Add a wetting agent to improve coverage.			
Celery	Beet Armyworm	1/2 - 1	7	48 hrs
	Aster Leafhopper			
	Loopers	1		
	Variegated Cutworm	1/2		
	Armyworms	1/4 - 1		
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Chicory	Beet Armyworm	1/2 - 1	80	48 hrs
	Variegated Cutworm Leafhoppers			
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Chinese Cabbage	Loopers	1/2 - 1*	10	48 hrs
	Beet Armyworm			
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP/acre/crop. Do not make more than 10 applications/crop. * Minimum of 25 gallons water per acre by ground or 5 gallons by air.			
Collards (Fresh market only)	Diamondback Moth	1/2	10	48 hrs
	Variegated Cutworm			
	Imported Cabbageworm Beet Armyworm Loopers*	1/2 - 1		
	Do not apply when temperature is less than 50° F. Do not apply when crop is less than 10" tall. Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop. * Do not use for Loopers in AL & GA.			
Corn (Field, Popcorn & Seed)	Earworm (Ovicide/Larvicide)	1/4 - 1/2	21- Ears 3 - Forage* 21 - Stover*	48 hrs
	Armyworm			
	Fall Armyworm			
	European Corn Borer- Ears 1-3 days or as needed			
	Corn Rootworm (adult beetles)			
	Flea Beetles			
	Picnic Beetles			
	Aphids			
	Variegated Cutworm, Beet Armyworm	1/2		
	Do not apply more than 2.5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. *Corn forage is green actively growing plants that are harvested with the ears intact, then plants can be fed directly to animals or used to make silage. Corn stover are the parts of the plant that remain after removal of the grain at full plant maturity. These remaining stalks and leaves can be fed as roughage to animals.			
Corn (Sweet)	Earworm-Whorl as needed	1/3 - 1/2	0 - Ears 3 - Forage 21- Stover	48 hrs
	Fall Armyworm Armyworm	1/4 - 1/2		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
	Earworm,- (Ovicide/Larvicide) European Corn Borer- Ears 1-3 days or as needed Corn Rootworm (adult beetles) Flea Beetles Picnic Beetles Aphids			
	Variegated Cutworm Beet Armyworm	1/2		
	Certain hybrid varieties of sweet corn are susceptible to methomyl injury. Treat a small area to determine crop safety before full scale spraying. Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 28 applications per crop; minimum interval between treatments is 1 day.			
Cotton All U.S.	Ovicide/Larvicide - Bollworm, Tobacco Budworm (Initiate schedule when significant numbers of eggs are present. Continue at 3 to 5-day intervals while eggs are present and larval control is adequate. If significant larvae survive, use higher rates below.) Lygus Bugs/Plant Bugs (adults and nymphs) start treatment on low level population for suppression.	1/8 - 1/4 (see Insect Predator Section)	15	72 hrs
	Cotton Leafworm	1/4 - 1/2		
	Cotton Fleahopper (as needed)	1/8 - 1/4		
	Aphids, Thrips	1/4		
East of Rockies Only	(Early Season) Bollworm, Tobacco Budworm, Beet Armyworm, Cotton Leafperforator, Fall Armyworm, Lygus Bugs/Plant Bugs (adults and nymphs) Use as occasional spray in regular schedule but not more often than every 10 days.	1/2		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
East of Rockies Only	(Late Season) Bollworm, Tobacco Budworm, Beet Armyworm, Cotton Leafperforator, Fall Armyworm, Lygus Bugs/Plant Bugs (adult and nymphs). Up to 3 applications at 3-5 day intervals after desired boll load set on plants.	1/2 - 3/4	15	72 hrs
Texas	Cotton Aphid	1/4 - 2/3		
West of Rockies only	Larvicide for worms Bollworm, Fall Armyworm, Tobacco Budworm, Lygus Bugs Beet Armyworm Cotton Leafperforator	1/2 - 3/4 1/3 - 3/4		
	For applications West of the Rockies, make applications on 3-5 day intervals after desired boll load set on plants. For all cotton applications: Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop . Use may redder cotton. If excessive stop or alternate with other insecticides. Do not graze or feed.			
Cucumber	Loopers Tobacco Budworm Beet Armyworm, Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickleworm Fall Armyworm Variegated Cutworm	1/2 - 1 1/2	1/2 lb. -- 1 Over 1/2 lb.- 3	48 hrs
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 12 applications per crop.			
Eggplant	Green Peach Aphid Tomato Pinworm (Ground Application only) Beet Armyworm Corn Earworm	1/4 - 1 1/2 - 1	5	48 hrs
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Endive, Escarole	Beet Armyworm	1/2 - 1	10	48 hrs
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Garlic	Beet Armyworm	1/2 **	7	48 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 6 applications per crop. ** Add a wetting agent to improve coverage.			
Grapefruit CA, AZ & HI only	Thrips Fruittree Leafroller Orange Tortrix Western Tussock Moth Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Horseradish Ground application only	Aphids Thrips	1/2	65	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application - Days To Harvest	REI
Leafy Green Vegetables: Beet (tops) Dandelions, Kale, Mustard Greens, Parsley, Swiss Chard, Turnip Greens	Beet Armyworm Cabbage Looper* Diamondback Moth Imported Cabbageworm	1/2 - 1	10	48 hrs
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop . * Do not use for Cabbage Loopers in AL & GA.			
Lemon CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Lentils	Western Yellowstriped Armyworm	1/2 - 1	21	48 hrs
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Lettuce (Head and Leaf varieties)	Alfalfa Looper	1/4 - 1	1/4-1/2 lb. - 7 over 1/2 lb. - 10	48 hrs
	Thrips Aphids Beet Armyworm Cabbage Looper Corn Earworm Aster Leafhopper	1/2 - 1		
	Variegated Cutworm	1/2		
	Lettuce (head varieties) Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 15 applications per crop; minimum interval between treatments is 2 days. Lettuce (leaf varieties) Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop; minimum interval between treatments is 2 days.			
Melons Including: Cantaloupe Casaba Santa Claus melon Crenshaw melon Honeydew melon Honey balls Persian melon Golden Pershaw melon Mango melon Pineapple melon Snake melon Watermelon	Loopers Tobacco Budworm Beet Armyworm Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickleworm Fall Armyworm	1/2 - 1	1/2 lb. -- 1 over 1/2 lb. -- 3	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 12 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application - Days To Harvest	REI
Mint (Peppermint, Spearmint)	Variegated Cutworm Alfalfa Looper	1	14	48 hrs
	Flea Beetles	3/4 - 1		
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Nectarine CA & AZ only	Thrips	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 3 applications per crop.			
Oats	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).			
Onions (Green & Dry Bulb)	Beet Armyworm	1/2 - 1 **	7 - Green and Dry Bulb Onions	48 hrs
	Thrips* Variegated Cutworm Black Cutworm	1 **		
	Onions, green Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop; minimum interval between treatments is 5 days. Onions, dry bulb Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop; minimum treatment interval between treatments is 5 days. *Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation to control thrips. Begin applications before thrip populations reach 3-5 thrips per plant. For best results, add a wetting agent. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. ** Add a wetting agent to improve coverage.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Oranges CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix Fruittree Leafroller Beet Armyworm Citrus Cutworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Peaches	Catfacing Insects (Plant Bugs and Stink Bugs) - begin at petal fall and continue in cover sprays at 7-to 10-day intervals Oriental Fruit Moth* -begin at petal fall; use trapping devices and frequent field inspection to determine need for treatment. Continue treatment in cover sprays and alternate with residual-type insecticides registered for this use. Green Peach Aphid	1 lb (or 1/4 lb per 100 gal up to 400 gal per acre)	4	4 days
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 6 applications per crop. * Oriental Fruit Moth (Ground Application Only).			
Peanuts	Corn Earworm* Potato Leafhopper Fall Armyworm	1/4 - 1	21	48 hrs
	Beet Armyworm	3/8 - 1		
	Green Cloverworm Velvetbean Caterpillar Cabbage Looper Soybean Looper ** Thrips Granulate Cutworm	1/2 - 1		
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop. * ROTAM METHOMYL 90SP has ovicidal and larvicidal control on corn earworm. **Soybean Looper is difficult to control. Do not apply to worms greater than 1 per 2" long. Use higher rate for severe infestations. Do not feed treated vines.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application - Days To Harvest	REI
Pears Northeast only	Green Fruitworm Oblique banded Leafroller	1/2 - 1 *	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop. * Apply in a minimum of 50 gallons of water per acre.			
Peas (succulent) Including: Pigeon peas Chick peas Garbanzo beans Dwarf peas Garden peas Green peas English Peas Field peas Edible pod peas	Alfalfa Looper Cabbage Looper* Pea Aphid Beet Armyworm Saltmarsh Caterpillar Variegated Cutworm	1/2 - 1	1 - Peas 5 - Forage 14 - Hay	48 hrs
	Alfalfa Caterpillar Armyworm Green Cloverworm	1/4 - 1		
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 6 applications per crop; minimum interval between treatments is 3 days. * Do not use for Cabbage Loopers in AL & GA.			
Pecans Southeast only	Aphids	1/2 - 1	30	48 hrs
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP/acre/crop. Do not make more than 7 applications per crop.			
Peppers Including: Bell Hot Pimentos Sweet	Loopers Beet Armyworm Green Peach Aphid Armyworm Fall Armyworm	1/2 - 1	3	48 hrs
	Variegated Cutworm	1/4 - 1/2		
	European Corn Borer	1		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Pomegranates	Omnivorous Leafroller	1	14	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Potato	Tuberworm* Loopers Aphids Beet Armyworm Leafhoppers Fall Armyworm	1/2 - 1	6	48 hrs
	Variegated Cutworm Flea Beetles	1/2		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Potato (cont.)	Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section. *Repeat applications of ROTAM METHOMYL 90SP on a 5-7 day schedule, or longer as needed, to control tuber worm populations. An application schedule of effective insecticides with different modes of action may be needed to keep foliar feeding larval populations as low as possible prior to harvest to reduce the risk of larval damage to the tubers. Failure to adequately control tuberworm larvae prior to crop senescence or vine kill increases the risk of tuber damage.			
Rye	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).			
Sorghum Including: Sudangrass (Except Sweet Sorghum)	Sorghum Webworm	1/2 *	14 **	48 hrs
	Sorghum Midge --Apply when 50% bloom and 3-5 days later if needed. Fall Armyworm (Budworm) Beet Armyworm Corn Earworm Armyworm	1/4 - 1/2 *		
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop. * Minimum of 10 gallons per acre by ground or 2 gallons per acre by air. ** Do not apply within 14 days of feeding forage or cutting for hay.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Soybeans	Green Cloverworm Velvetbean Caterpillar Mexican Bean Beetle Corn Earworm Light to Moderate infestations	1/8 - 1/4 (see Insect Predator section)	14 - Soybeans 3 - Forage 12 - Hay	48 hrs
	Moderate to severe infestations	1/4 - 1/2		
	Soybean Aphid	1/6 - 1/3		
	Beet Armyworm Salt Marsh Caterpillar Bean Leaf Beetle Fall Armyworm Thrips Silver Spotted Skipper Light to Moderate infestations	1/4 - 3/8		
	Moderate to severe infestations	3/8 - 1/2		
	Do not apply more than 1.5 pounds of ROTAM METHOMYL 0SP per acre per crop. Do not make more than 3 applications per crop.			
Spinach	Alfalfa Loopers Cabbage Looper Beet Armyworm Fall Armyworm	1/2 - 1	7	48 hrs
	Variegated Cutworm	1/2		
	Do not apply when minimum daily temperature is 32° F, or lower. Do not apply to seedlings less than 3" diameter. Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Sugar Beet	Beet Webworm Flea Beetles Carrion Beetles Beet Armyworm* Aphids* Western Yellowstriped Armyworm*	1/4 - 1	30 -Tops 21 - Roots	48 hrs
	Variegated Cutworm	1/2		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Sugar Beet (cont.)	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. *Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation to control beet armyworm, aphids and western yellowstriped armyworm. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information.			
Summer Squash* Including: Crookneck squash Straightneck squash Scallop squash Vegetable marrow Spaghetti squash Hytan Cucuzza Hechima Chinese okra Bitter melon Balsam pear Balsam apple Chinese Cucumber	Loopers Tobacco Budworm Beet Armyworm Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickleworm Fall Armyworm	1/2 - 1	1/2 lb. -- 1 day over 1/2 lb.-- 3 days	48 hrs
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 12 applications per crop. *Fruit of the Gourd (Cucurbit accae) family that are consumed when immature, 100% of the fruit is edible cooked or raw, once picked cannot be stored, has a soft rind which is easily penetrated, and if seeds were harvested they would not germinate.			
Tangelo, Tangerine CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix, Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Tobacco (Except shade)	Flea Beetle Hornworm	1/4 - 1/2	5 - Flue cured 14 - Air or fire cured	48 hrs
	Loopers Aphids Tobacco Budworm Fall Armyworm	1/2		
	Do not apply more than 2.5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 5 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Tomato (Including Tomatillos*)	Tomato Fruitworm Aphids Hornworm Loopers Beet Armyworm Southern Armyworm Pinworm Armyworm Fall Armyworm	1/2 - 1	1	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop Do not make more than 16 applications per crop. * For tomatillos do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop . Do not make more than 5 applications per crop.			
Turf (For use on sod farms only)	Sod Webworm (after application, sprinkle irrigate for 15 minutes)	1 (2/5 ozs. per 1000 sq. ft.)		48 hrs
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Do not graze or feed.			
Wheat	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications to s on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).			

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Handle this package carefully to prevent breakage of inner bag when stored at low temperatures. Allow to warm above 50 Deg.F for normal handling. Store product in original container only. Do not contaminate water, other pesticides, fertilizer, food or feed in storage. Not for use or storage in or around the home.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: For Water Soluble Packets: Do not reuse the outer box or the resealable plastic bag. When all water-soluble packets are used, the outer packaging should be clean and may be disposed of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by open burning. If burned, stay out of smoke. If the resealable plastic bag contacts the formulated product in any way, the bag must be triple-rinsed with clean water. Add the rinsate to the spray tank and dispose of the outer wrap as described above.

For Paper and Plastic Bags: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In the event of a major spill, fire or other emergency, call CHEMTREC Day or Night, 1-800-424-9300.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Rotam Agrochemical Company Limited or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Rotam Agrochemical Company Limited and Seller harmless for any claims relating to such factors.

Rotam Agrochemical Company Limited warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Rotam Agrochemical Company Limited, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW ROTAM LTD MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the extent consistent with applicable law, Rotam Agrochemical Company Limited or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ROTAM AGROCHEMICAL COMPANY LIMITED AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ROTAM AGROCHEMICAL COMPANY LIMITED OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Rotam Agrochemical Company Limited and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of Rotam Agrochemical Company Limited.

Manufactured by:
Rotam Agrochemical Company Ltd.
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong
1-866-927-6826

Registered: [TBA]

RESTRICTED USE PESTICIDE

Due to high Acute Toxicity to Humans

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

GROUP 1A INSECTICIDE

Rotam Methomyl 90SP Insecticide *In Water Soluble Packets*

Active Ingredient	By Weight
Methomyl (S-methyl-N-[(methylcarbamoyl) oxy]thioacetimidate)	90%
Other Ingredients	10%
TOTAL	100%

EPA Reg. No. 83100 - 28

EPA Est. No.: 69821-CHN-005

Manufactured by:
Rotam Agrochemical Company Ltd.
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong
1-866-927-6826

Net Contents:
Packets/Container
TBA

Registered: (TBA)

KEEP OUT OF REACH OF CHILDREN

DANGER

POISON



PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

Refer to inside label booklet for additional precautionary information including Personal Protective Equipment (PPE), User Safety Recommendations, Engineering Controls Statements, Environmental Hazards and Directions For Use.

FIRST AID

(N-Methyl Carbamate insecticide)

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

ATROPINE IS AN ANTIDOTE --SEEK MEDICAL ATTENTION AT ONCE IN ALL CASES OF SUSPECTED POISONING.

If poisoning symptoms appear (see POISONING SYMPTOMS), get medical attention.

POISONING SYMPTOMS — Methomyl poisoning produces effects associated with anticholinesterase activity which may include weakness, blurred vision, headache, nausea, abdominal cramps, discomfort in the chest, constriction of pupils, sweating, slow pulse, muscle tremors. If poisoning symptoms appear, refer to First Aid section and seek medical attention at once.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

TREATMENT — Atropine sulfate should be used for treatment. Administer repeated doses, 1.2 to 2.0 mg. intravenously every 10 to 30 minutes until full atropinization is achieved. Maintain atropinization until the patient recovers. Artificial respiration or oxygen may be necessary. Allow no further exposure to any cholinesterase inhibitor until recovery is assured.

Do not use 2-PAM for exposure to ROTAM METHOMYL 90SP alone. However, for exposure to combinations of ROTAM METHOMYL 90SP and organophosphorous insecticides, 2-PAM may be used as required to supplement the atropine sulfate treatment. Do not use morphine.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

You may also contact the National Poison Control Center 24-hr Emergency Hotline at: 1-800-222-1222.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

Restricted Use Pesticide due to toxicity categories. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

Fatal if swallowed. May be fatal if inhaled or gets in eyes. Do not breathe dust. Do not get in eyes. Avoid contact with clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, loaders, applicators, cleaners, repairers of application equipment, and others exposed to the concentrate must wear:

- Long sleeve shirt and long pants.
- Chemical-resistant gloves, such as barrier laminate or butyl rubber.
- Socks and chemical resistant footwear.
- Protective eyewear.
- Chemical resistant apron.

~~For exposures in enclosed areas:~~ Respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or a canister with any R, P, or HE prefilter.

Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any R, P, or HE prefilter.

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry

USER SAFETY RECOMMENDATIONS

USERS SHOULD:

- Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove personal protective equipment immediately after handling this product.
- Wash the outside of gloves before removing.
- As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, and mammals. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high-water mark. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area. This chemical is known to leach through soil into groundwater under certain conditions as a result of label use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

This chemical can contaminate surface water through spray drift. Under some conditions, it may also have a high potential for runoff into surface water for several days to weeks after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, and areas overlaying extremely shallow groundwater, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas over-laying tile drainage systems that drain to surface water.

PHYSICAL AND CHEMICAL HAZARDS

Keep container closed. Use with adequate ventilation.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Handle this package carefully to prevent breakage of inner bag when stored at low temperatures. Allow to warm above 50 Deg.F for normal handling. Store product in original container only. Do not contaminate water, other pesticides, fertilizer, food or feed in storage. Not for use or storage in or around the home.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: For Water Soluble Packets: Do not reuse the outer box or the resealable plastic bag. When all water-soluble packets are used, the outer packaging should be clean and may be disposed of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by open burning. If burned, stay out of smoke. If the resealable plastic bag contacts the formulated product in any way, the bag must be triple-rinsed with clean water. Add the rinsate to the spray tank and dispose of the outer wrap as described above.

For Paper and Plastic Bags: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In the event of a major spill, fire or other emergency, call CHEMTREC Day or Night, 1-800-424-9300.

Manufactured by:
Rotam Agrochemical Company Ltd.
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong
1-866-927-6826

Net Contents:
Packets/Container
TBA



t
Frank Sobotka o Thomas Harris
:

04/05/2011 10:10 AM

History: This message has been replied to.

Trust I found and made all the correct changes you indicated on your email. See attached revised labels. Please acknowledge receipt of this email. Thanks,

Dr. Frank E. Sobotka, Senior Partner
IPM Resources LLC
4032 Crockers Lake Blvd.
Suite 818
Sarasota, FL 34238
PH: 215 497-9501
FX: 215 497-9502




083100-0027.20110405.Primary Lbl.pdf



083100-0028.20110405.Primary Lbl.pdf



a few more corrections for 83100-ET and 83100-EI 

Thomas Harris o Frank Sobotka

04/05/2011 05:00 AM

Dr. Sobotka,

Thanks for the revised labels. You did a good job correcting them. I noticed you even found a few errors I had missed (eg. First Aid, If Swallowed). Just a few more corrections. I'll be in meetings for a few hours Tuesday morning so you'll have time to make these changes and email me revised labels.

83100-ET

1) Front panel(s) - Below ingredient statement (all occurrences throughout label) put a placeholder for text to say either "refillable container" or "nonrefillable container". This text is referenced in the Storage Disposal and guides the user to the proper disposal directions.

2) Precautionary Statements - Delete the personal protective equipment text at the end of the intro paragraph ("Contains methanol. Methanol may cause blindness"). This text is not necessary since it is followed by a PPE section. Worse, it conflicts with PPE section in some areas.

Note: It is ok to retain a general reference like "wear protective eyewear" in the Precautionary Statement intro paragraph if you wish to emphasize a particularly important piece of PPE. Just be careful that the text does not conflict with the specific PPE in the PPE section. If in doubt, leave PPE out of intro paragraph.

Note 2: You may have copied this from the acute tox review. Don't. We have a program that writes the text for the review when you enter the acute tox categories but the grammar in the resulting text is terrible and the PPE not entirely complete. Instead, determine the PPE using the acute tox categories and the Label Review Manual.

3) DFU/Crop Directions - In several locations (eg. alfalfa, barley, oats, peas, potato, rye, wheat) you have added two sentences for the concepts to a) use a wetting agent to improve performance, and b) spray at 5-7 day intervals. Where did these come from? I don't see them on the Dupont label. While I normally wouldn't care about directions on optimizing performance, the wetting agent could be a problem. When we set tolerances the residue studies were suppose to have been done either with or without a surfactant as directed on the label. It would be fairly common for residues set without a surfactant to be exceeded when a surfactant is used (i.e. the surfactant often enhances penetration into crop).

Either a) delete these two statements (at least wetting agent one) (all occurrences) if you just added them without similar text on the Dupont label or b) you can leave them if they appear somewhere on the Dupont label.

4) DFU/peas - Delete chemigation text. This does not occur on the Dupont Sec 3 label. Might be on an SLN or Supplemental but you should not use on Rotam product.

5) DFU/Storage and Disposal - Looks good; very complete. If you wish, you can delete directions for any type/size container that will not be used by Rotam product. For example, if you will only market in non-refillable 2.5 and 5 gal containers then you do not need the >5 gal or IBC or refillable directions. Up to you.

6) p. 38, back page of booklet that remains on container - Delete the current PPE paragraph. Replace with PPE section as per earlier in label on p. 5. As before, current PPE in paragraph does not agree with PPE section (latter is correct).

83100-EI

1) Precautionary Statements -

a) Replace intro paragraph with the following which separates hazards and what not to do text:

"Fatal if swallowed. May be fatal if inhaled or gets in eyes. Do not breathe dust. Do not get in eyes. Avoid contact with clothing."

b) Delete washing instructions. Put in separate section per (d) below.

c) Delete the personal protective equipment text at the end of the intro paragraph ("Fatal if swallowed...."). This text is not necessary since it is followed by a PPE section. Worse, it conflicts with PPE section in some areas.

Note: It is ok to retain a general reference like "wear protective eyewear" in the Precautionary Statement intro paragraph if you wish to emphasize a particularly important piece of PPE. Just be careful that the text does not conflict with the specific PPE in the PPE section. If in doubt, leave PPE out of intro paragraph.

d) Add a "User safety recommendations" section as on 83100-ET.

2) Precautionary Statements, PPE - Delete "Respirator as outlined below" bullet, "For exposure in enclosed areas", Start "Respirator" with capital "R", delete "For exposures outdoors." Sorry, I missed these in my initial review.

Note: The "Engineering control" section will provide alternate PPE for normal use of the water soluble packets by mixer/loaders. The PPE section is used by other handlers (applicators, cleaners, etc).

3) DFU/Storage Disposal - If you will only package in water soluble packets in foil liner in a box, you can delete the disposal sections for "fiber drums with liners" and "paper and plastic bags". Dupont uses these for some bulk product but they may not apply to Rotam product. Your choice.

4) p. 38, back page of booklet that remains on container - As in #1 above,

a) Correct intro Precautionary Statements paragraph.

b) Delete washing instructions in intro paragraph.

c) Remove current PPE in intro paragraph in Precautionary Statements.

d) Add a PPE section as on p. 5 earlier in label.

e) Add a "User safety recommendations" section as on 83100-ET.

Excuse the odd hour of sending this. I had reviewed your revised labels yesterday afternoon then brought them home to write/send this email. In the middle of writing the corrections our power went out. Of course, I had not save my corrections as I wrote them! Power just came back on along with all the lights in the house, hence I'm awake! You can be sure I save my writing a dozen times as I composed this email. I'd better send this email before power goes out again.

Tom Harris
EPA/OCSP/OPP/RD/IRB
voice: (703) 308-9423
fax: (703) 308-0029

RESTRICTED USE PESTICIDE

Due to High Acute Toxicity to Humans

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

GROUP

1A

INSECTICIDE

Rotam Methomyl 90SP Insecticide *In Water Soluble Packets*

Active Ingredient	By Weight
Methomyl	
(S-methyl-N-[(methylcarbamoyl)oxy]thioacetimidate)	90%
Other Ingredients	10%
TOTAL	100%

EPA Reg. No. 83100 - 28

EPA Est. No.: 69821-CHN-005

KEEP OUT OF REACH OF CHILDREN

DANGER

POISON



PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See additional Precautionary Statements on inside booklet and back panel of container and Directions for Use on inside booklet.

Manufactured by:
Rotam Agrochemical Company Ltd.
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong
1-866-927-6826

Net Contents:
Packets/Container
TBA

RESTRICTED USE PESTICIDE**Due to High Acute Toxicity to Humans**

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

GROUP**1A****INSECTICIDE**

Rotam Methomyl 90SP Insecticide

In Water Soluble Packets

<u>Active Ingredient</u>	<u>By Weight</u>
Methomyl	
(S-methyl-N-[(methylcarbamoyl)oxy]thioacetimidate)	90%
Other Ingredients	10%
TOTAL	100%

EPA Reg. No. 83100 - 28

EPA Est. No.: 69821-CHN-005

Manufactured by:
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 1-866-927-6826

Net Contents:
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KEEP OUT OF REACH OF CHILDREN**DANGER****POISON****PELIGRO**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

Refer to inside label booklet for additional precautionary information including Personal Protective Equipment (PPE), User Safety Recommendations, Engineering Controls Statements, Environmental Hazards and Directions For Use.

FIRST AID

(N-Methyl Carbamate insecticide)

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

ATROPINE IS AN ANTIDOTE --SEEK MEDICAL ATTENTION AT ONCE IN ALL CASES OF SUSPECTED POISONING.

If poisoning symptoms appear (see POISONING SYMPTOMS), get medical attention.

POISONING SYMPTOMS — Methomyl poisoning produces effects associated with anticholinesterase activity which may include weakness, blurred vision, headache, nausea, abdominal cramps, discomfort in the chest, constriction of pupils, sweating, slow pulse, muscle tremors. If poisoning symptoms appear, refer to First Aid section and seek medical attention at once.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

TREATMENT — Atropine sulfate should be used for treatment. Administer repeated doses, 1.2 to 2.0 mg. intravenously every 10 to 30 minutes until full atropinization is achieved. Maintain atropinization until the patient recovers. Artificial respiration or oxygen may be necessary. Allow no further exposure to any cholinesterase inhibitor until recovery is assured.

Do not use 2-PAM for exposure to ROTAM METHOMYL 90SP alone. However, for exposure to combinations of ROTAM METHOMYL 90SP and organophosphorous insecticides, 2-PAM may be used as required to supplement the atropine sulfate treatment. Do not use morphine.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

You may also contact the National Poison Control Center 24-hr Emergency Hotline at: 1-800-222-1222.

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS
AND DOMESTIC ANIMALS
KEEP OUT OF REACH OF CHILDREN

DANGER

POISON



PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

Restricted Use Pesticide due to toxicity categories. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

Fatal if swallowed. May be fatal if inhaled or gets in eyes. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Do not breathe dust. Remove and wash contaminated clothing before reuse. Avoid contact with clothing. Do not get in eyes. Wear protective eyewear. Wear: Long-sleeved shirt and long pants, socks, chemical-resistant shoes, and chemical-resistant gloves (such as barrier laminate or butyl rubber).

For handling activities, use a non-powered air purifying respirator equipped with an N-, R-, or P- series filter.

PRECAUTIONARY STATEMENTS (Continued)

HAZARDS TO HUMAN AND DOMESTIC ANIMALS

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, loaders, applicators, cleaners, repairers of application equipment, and others exposed to the concentrate must wear:

- Long sleeve shirt and long pants.
- Chemical-resistant gloves, such as barrier laminate or butyl rubber.
- Socks and chemical resistant footwear.
- Protective eyewear.
- ~~Respirator as outlined below.~~
- Chemical resistant apron.

~~For exposures in enclosed areas,~~ a respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or a canister with any R, P, or HE prefilter.

~~For exposures outdoors,~~ Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any R, P, or HE prefilter.

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry

ENGINEERING CONTROL STATEMENTS

Human flaggers must be in enclosed cabs.

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR part 170.240 (d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

The enclosed cabs must be used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR part 170.240 (d)(4-6)]. The handler PPE requirements may be reduced or modified as specified in the WPS.

Water soluble packets when used correctly qualify as a closed loading system under the WPS. Handlers handling this product while it is enclosed in intact water-soluble packets are permitted to wear long-sleeved shirt, long pants, shoes plus socks, chemical-resistant gloves, and chemical-resistant apron, provided the other required PPE is immediately available in case the bag is opened.

Pilots must not assist in the mixing and loading operations.

USER SAFETY RECOMMENDATIONS

Users Should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove personal protective equipment immediately after handling this product.
- Wash the outside of gloves before removing.
- As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, and mammals. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high-water mark. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area. This chemical is known to leach through soil into groundwater under certain conditions as a result of label use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

This chemical can contaminate surface water through spray drift. Under some conditions, it may also have a high potential for runoff into surface water for several days to weeks after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, and areas overlaying extremely shallow groundwater, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas over-laying tile drainage systems that drain to surface water.

PHYSICAL AND CHEMICAL HAZARDS

Keep container closed. Use with adequate ventilation.

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DIRECTIONS FOR USE

Restricted Use Pesticide

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI). REI Summary: REI peaches = 4 day; REI apple, cotton, grapefruit, lemon, nectarine, orange, tangelo, tangerine = 3 day; all other WPS uses = 48 hour REI.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical Resistant Gloves Category A (such as butyl rubber, natural rubber, neoprene rubber or nitrile rubber), all >14 mils
- Shoes plus socks
- Protective eyewear

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

Do not formulate this product into other End-use products without written permission from Rotam.

Do not apply thru Drip Chemigation unless accompanied by Rotam supplemental Labeling.

ROTAM METHOMYL 90SP insecticide should be used only in accordance with directions for use on this label or in separate Rotam supplemental labeling. Rotam will not be responsible for use of the product in a manner not specified by Rotam in the product's labeling and User assumes all risk for such use.

ROTAM METHOMYL 90SP is a dry powder to be dissolved in water for application by mechanical ground, overhead sprinkler, or aerial application Hand-

held equipment is prohibited for application to crops.

Do not apply by ground equipment within 25 feet, or by air within 100 feet of lakes, reservoirs, rivers, estuaries, commercial fish ponds and natural, permanent streams, marshes or natural, permanent ponds. Increase the buffer zone to 450 feet from the above aquatic areas when ultra low volume application is made.

Pilots must not assist in the mixing and loading operations.

Use only in commercial and farm plantings. Not for use in home plantings. Not for use during any period after a commercial crop site is opened for public entry as a "U-Pick", "Pick Your Own" or similar operation; in no case shall preharvest applications be made after first public entry. The restricted entry interval and preharvest interval for the crop stated elsewhere on this label must be followed.

RESISTANCE MANAGEMENT

For resistance management, ROTAM METHOMYL 90SP insecticide is a group 1A insecticide. Repeated and exclusive use of ROTAM METHOMYL 90SP or other group 1A insecticides may lead to the build-up of resistant strains of insects in some crops. Not all members of this group have been shown to be cross-resistant. Different resistance mechanisms that are not linked to target site of action, such as enhanced metabolism, are common for this group of chemicals. Alternation of compounds from different sub-groups within this group may be an acceptable part of an integrated pest management program.

Some insects are known to develop resistance to products used repeatedly for control. When this occurs, the recommended dosages fail to suppress the pest population below the economic threshold. Because the development of resistance cannot be predicted, the use of this product should conform to resistance management strategies established for the use area. These strategies may include incorporation of cultural and biological control practices, alternation of active classes of insecticides on succeeding generations and targeting the most susceptible life stage. Consult your local or state agricultural authorities for details.

If resistance to this product develops in your area, this product, or other products with a similar mode of action, may not provide adequate control. If poor performance cannot be attributed to improper application or extreme weather conditions, a resistant strain of insect may be present. If you experience difficulty with control and resistance is a reasonable cause, immediately consult your local company representative or agricultural advisor for the best alternative method of control for your area. For additional information on insect resistance monitoring, visit the Insecticide Resistance Action Committee (IRAC) on the web at <http://www.irac-online.org>.

INTEGRATED PEST MANAGEMENT

This product should be used as part of an Integrated Pest Management (IPM) program which can include biological, cultural, and genetic practices aimed at preventing economic pest damage. Application of this product should be based on IPM principles and practices including field scouting or other detection methods, correct target pest identification, population monitoring, and treating when target pest populations reach locally determined action thresholds. Consult your state cooperative extension service, professional consultants or other qualified authorities to determine appropriate action treatment threshold levels for treating specific pest/crop systems in your area.

SCOUTING

Monitor insect populations to determine whether or not there is a need for application of ROTAM METHOMYL 90SP based on locally determined economic thresholds. More than one treatment of ROTAM METHOMYL 90SP may be required to control a population of pests.

BENEFICIAL ANTHROPODS

ROTAM METHOMYL 90SP at rates of 1/8 to 1/4 lb. per acre helps conserve certain beneficials, including big-eyed bugs, damsel bugs, flower bugs and spiders in cotton and soybeans. While these beneficials cannot be relied upon to control pests, they are of potential value and should be monitored along with pests in pest management programs on these crops.

SPRAY PREPARATION

Spray equipment must be clean and free of previous pesticide deposits before applying ROTAM METHOMYL 90SP.

Fill spray tank 1/4 to 1/2 full of water. Add ROTAM METHOMYL 90SP directly to spray tank. Carefully open the outer barrier bag containing ROTAM METHOMYL 90SP in a water soluble bag. Do not cut open the outer barrier bag. Invert the outer barrier bag allowing the inner water soluble bag to fall directly into the spray tank. Do not allow packets to become wet prior to adding to the spray tank. Do not handle, open, rip, tear, cut or perforate the inner water soluble bag. Mix thoroughly to fully dissolve the insecticide; once dissolved continued agitation is not required. Use mechanical or hydraulic means; do not use air agitation. Be sure the soluble packet is completely dissolved before adding any other ingredients. Spray mix should not be stored overnight in spray tank.

Compatibility: Since formulations may be changed and new ones introduced, it is recommended that users premix a small quantity of a desired tank mix and observe for possible adverse changes (settling out, flocculation, etc.). Avoid mixtures of several materials and very concentrated spray mixtures.

Do not use ROTAM METHOMYL 90SP with Bordeaux mixture (copper sulfate and hydrated lime), "Du Ter" (triphenyltin hydroxide), lime sulfur, "Rayplex" iron nor in highly alkaline solutions. Use mildly alkaline mixtures immediately after mixing to prevent loss of insecticidal activity.

Tank-mix solutions containing Boron may affect solubility of the water soluble film. When using Boron containing solutions in a tank-mix, follow these procedures:

- Add the correct amount of ROTAM METHOMYL 90SP water soluble packets first
- Be sure the soluble packets are completely dissolved
- Introduce Boron containing solutions last

If the above procedure cannot be followed, and Boron is an essential part of the spray mix, substitute ROTAM METHOMYL 29LV formulation for the water soluble packets.

Tank Mix Sequence: Add different formulation types in the sequence indicated below. Allow time for complete mixing and dispersion after addition of each product.

1. ROTAM METHOMYL 90SP and other products in water soluble bags.
2. Water dispersible granules
3. Wettable powders
4. Water based suspension concentrates
5. Water soluble concentrates

6. Oil based suspension concentrates
7. Emulsifiable concentrates
8. Adjuvants, surfactants, oils
9. Soluble fertilizers
10. Drift retardants

Follow local practice and manufacturer's recommendation.

APPLICATION

Apply at the recommended rates when insect populations reach locally determined economic thresholds. Consult the cooperative extension service, professional consultants or other qualified authorities to determine appropriate threshold levels for treatment in your area.

Follow-up treatments of ROTAM METHOMYL 90SP should be applied, as needed, to keep pest populations within threshold limits. On most crops, ROTAM METHOMYL 90SP should be applied at 5 to 7 day intervals to maintain control. Refer to crop specific directions for use in the crop tables for more specific information on treatment intervals.

Use sufficient water to obtain thorough, uniform coverage. Since ROTAM METHOMYL 90SP is a fast acting contact insecticide, best results follow direct spraying of the target insect.

For aerial, use a minimum of 2 gals. per acre (gpa) except 10 gpa for peaches and nectarines; 15 gpa for oranges, lemons, grapefruit, tangelos and tangerines.

For certain crops a minimum of 1 gallon per acre may be used providing the following conditions are met:

- equipment is adjusted to distribute spray uniformly over the spray swath,
- wind conditions and other factors such as temperature and humidity are such that the spray is delivered to the target area,
- local regulations do not prohibit low-volume aerial sprays,
- use rates are applied as directed on the package label or supplemental labeling for the following crops:

Alfalfa	Celery	Peas (succulent)
Anise	Collards	Peppermint
Asparagus	Corn	Peppers
Barley	Cotton	Potato
Beans	Cucumber	Rye
Broccoli	Lettuce	Soybean
Brussels sprouts	Melons	Spinach
Cabbage	Mint	Sugar beet
Carrot	Oats	Summer Squash
Cauliflower	Peanuts	Wheat

Apply the low rates on small plants, small insects and light infestations of insects. Use intermediate rates on large insects and heavier infestations of insects. Use 1 to 3 applications of the highest recommended rate for controlling severe infestations. Thereafter, use the lowest rate possible to maintain control.

SPRAY TANK CLEANOUT

Immediately following application, thoroughly clean all spray equipment to reduce the risk of forming hardened deposits which might become difficult to remove.

Drain spray equipment. Thoroughly rinse sprayer and flush hoses, boom and nozzles with clean water.

Clean all other associated application equipment. Take necessary safety precautions when cleaning equipment. Do not clean near wells, water sources or desirable vegetation. Dispose of waste rinse water in accordance with local regulations.

CHEMIGATION

Instructions for the Use of ROTAM METHOMYL 90SP on Alfalfa, Barley, Oats, Green and Dry Bulb Onions, Potatoes, Rye, Sugar Beets and Wheat Using Overhead Sprinkler Chemigation

Do not apply thru Drip Chemigation unless accompanied by Rotam supplemental Labeling.

Chemigation: Overhead sprinkler chemigation is allowed for use in alfalfa, barley, oats, onions, potatoes, rye, sugar beets, and wheat. Refer to supplemental, or Special Local Need (SLN) labeling or the crop specific sections of this label for use directions for chemigation. Do not apply this product through any other type of irrigation systems, except those allowed by instructions provided in a supplemental, SLN or this product label.

Overhead chemigation applications offer the advantage of greater penetration and coverage of the target plant. However, typical chemigation applications are more dilute than ground or aerial applications. For best results, it is recommended to keep the concentration of ROTAM METHOMYL 90SP as high as possible in the application. Apply ROTAM METHOMYL 90SP in 0.1 to 0.2 inches of water per acre. ROTAM METHOMYL 90SP is most active as a contact insecticide, although it does also have activity via ingestion of treated plants. For best results, applications of ROTAM METHOMYL 90SP should take place when the insects are active and most likely to come into direct contact with the application.

Types of Irrigation Systems

ROTAM METHOMYL 90SP may be applied through overhead sprinkler irrigation systems for control of various pests. Center pivot and lateral move irrigation systems are preferred. Other overhead sprinkler systems; such as end tow, side (wheel) roll and solid set, may be used if they provide uniform water distribution. Do not use filter screens smaller than 50 mesh throughout the system, due to possible build up of material on 100 mesh or smaller screens. Do not apply ROTAM METHOMYL 90SP through any other type of irrigation systems, except those allowed by instructions provided in a supplemental, SLN, or this product label.

General Directions for Chemigation

Preparation

A pesticide tank is recommended for the application of ROTAM METHOMYL 90SP in chemigation systems. Thoroughly clean the injection system and tank of any fertilizer or chemical residues using a standard clean-out procedure. Dispose of any residues in accordance with State and Federal laws. Add 1/4 to 1/2 of the desired amount of water and then measure the required amount of ROTAM METHOMYL 90SP into the tank. Complete filling the tank by adding the required amount of water. Agitate thoroughly to insure a uniform solution of ROTAM METHOMYL 90SP. Once in solution, no further agitation is required. Injection solution should not be stored overnight. Highly alkaline water should be buffered so that the pH of the spray solution is in the range of neutral to slightly acidic (pH5-7)

Injection into Chemigation Systems

Inject the proper amount of the ROTAM METHOMYL 90SP solution to the irrigation water flow using a positive displacement injection pump. Injection should occur at a point in the main irrigation water flow to ensure thorough mixing with the irrigation water. For continuously moving systems, inject the solution containing ROTAM METHOMYL 90SP into the irrigation water line continually and uniformly throughout the irrigation cycle. Apply in no more than 0.2 inches of water per acre. For overhead sprinkler systems that are stationary, add the solution containing ROTAM METHOMYL 90SP to the irrigation water line, and apply no more than 0.2 inches of water per acre, just before the end of the irrigation cycle.

Uniform Water Distribution

The irrigation system used for application of ROTAM METHOMYL 90SP must provide for uniform distribution of ROTAM METHOMYL 90SP treated water. Non-uniform distribution might result in crop injury, lack of effectiveness or illegal pesticide residues in or on the crop being treated. Ensure the irrigation system is calibrated to uniformly distribute the chemigation application to the crop. Contact the equipment manufacturer, the local University Extension agent or other experts if you have questions about achieving uniform distribution of the application.

Equipment Calibration

Calibrate the irrigation system and injector before applying ROTAM METHOMYL 90SP. Calibrate the injection pump while the system is running using the expected irrigation rate. If you have questions about calibration, you should contact your state extension service specialists, equipment manufacturer or other experts.

Monitoring of Chemigation Applications

A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of a responsible person, shall shut the system down and make necessary adjustments should the need arise. Wear the personal protective equipment as defined in the PPE section of the label for cleaners and repairers of application equipment when making adjustments or repairs on the chemigation system when ROTAM METHOMYL 90SP is in the irrigation water.

Required System Safety Devices

Do not connect any irrigation system used for pesticide applications to a public water system unless the pesticide label-prescribed safety devices are in place. Public water system means a system for the provision to the public of piped water for human consumption, if such a system has at least 15 service connections or regularly serves an average of at least 25 individuals at least 60 days out of the year.

1. The system must contain a functional check valve, vacuum relief valve and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.
2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut

off the pesticide injection pump when the water pump motor stops.

5. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.

6. Systems must use a metering pump such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

7. Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, backflow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, the water from the public water system should be discharged into a reservoir tank prior to pesticide introduction. There shall be a complete physical break (air gap) between the outlet end of the fill pipe and the top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.

Posting of Areas to be Treated

Posting of areas to be chemigated is required when 1) any part of a treated area is within 300 feet of sensitive areas such as residential areas, labor camps, businesses, daycare centers, hospitals, in-patient clinics, nursing homes, or any other public areas such as schools, parks, playgrounds, or other public facilities not including public roads, or 2) when the chemigated area is open to the public such as golf courses or retail greenhouses.

Posting must conform to all the following requirements. Treated areas shall be posted with signs at all usual points of entry and along likely routes of approach from the listed sensitive areas. When there are no usual points of entry, signs must be posted in the corners of the treated areas and in any other location affording maximum visibility to sensitive areas. The signs shall be printed in ENGLISH. Signs must be posted prior to application and must remain posted until foliage has dried and soil surface water has disappeared. Signs may remain in place indefinitely as long as they are composed of materials to prevent deterioration and maintain legibility for the duration of the posting period.

All words shall consist of letters at least 2 1/2 inches tall, and all letters and the symbol shall be a color, which sharply contrasts with their immediate background. At the top of the sign shall be the words "KEEP OUT", followed by an octagonal stop sign symbol at least 8 inches in diameter containing the word "STOP". Below the symbol shall be the words "PESTICIDE IN IRRIGATED WATER". Posting for chemigation does not replace other posting and reentry requirements for farm worker safety.

Operation

Start the water pump and sprinkler, and let the system achieve the desired pressure and speed before starting the injector. Start the injector and calibrate the injection system according to the directions above. This procedure is necessary to deliver the desired rate per acre in a uniform manner. Apply ROTAM METHOMYL 90SP in 0.1 to 0.2 inches of water per acre. When the application is finished, allow the entire irrigation and injector system to be thoroughly flushed clean before stopping the system. End guns must be turned off during the application, if they irrigate nontarget areas or if they do not provide uniform application and coverage.

It is recommended that nozzles in the immediate area of control panels, chemical supply tanks, wellheads and system safety devices be plugged to prevent contamination of these areas.

Do not apply when wind speed favors drift beyond the area intended for treatment.

Do not apply when system connections or fittings leak or when nozzles do not provide uniform distribution.

Cleaning the System

Thoroughly clean the injection system and tank of any fertilizer or chemical residues using a standard clean-out procedure. Dispose of any residues in accordance with State and Federal laws. Consult your owner's manual or your local equipment dealer for cleanout procedures for your injection system.

SPRAY DRIFT MANAGEMENT

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops. These requirements do not apply to forestry applications, public health uses or to applications using dry formulations.

1. The distance of the outer most nozzles on the boom must not exceed $\frac{3}{4}$ the length of the wingspan or rotor.
2. Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

Where states have more stringent regulations, they should be observed. The applicator should be familiar with and take into account the information covered in the Aerial Drift Reduction Advisory Information.

AERIAL DRIFT REDUCTION ADVISORY INFORMATION

Importance of Droplet Size

The most effective way to reduce drift potential is to apply large droplets (>150 - 200 microns). The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. The presence of sensitive species nearby, the environmental conditions, and pest pressure may affect how an applicator balances drift control and coverage. **APPLYING LARGER DROPLETS REDUCES DRIFT POTENTIAL, BUT WILL NOT PREVENT DRIFT IF APPLICATIONS ARE MADE IMPROPERLY OR UNDER UNFAVORABLE ENVIRONMENTAL CONDITIONS! See WIND, TEMPERATURE AND HUMIDITY, and TEMPERATURE INVERSIONS sections of this label.**

Controlling Droplet Size – General Techniques

- **Volume** - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- **Pressure** - Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types lower pressure produces larger droplets. Use the lower spray pressures recommended for the nozzle. Higher pressure reduces droplet size and does not improve canopy penetration. **WHEN HIGHER FLOW RATES ARE NEEDED, USE A HIGHER-CAPACITY NOZZLE INSTEAD OF INCREASING PRESSURE.**
- **Nozzle Type** - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

Controlling Droplet Size – Aircraft

- **Number of Nozzles** - Use the minimum number of nozzles that provide uniform coverage.
- **Nozzle Orientation** - Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
- **Nozzle Type** - Solid stream nozzles (such as disc and core with swirl plate removed) oriented straight back produce larger droplets than other nozzle types and the lowest drift.
- **Boom Length** - For some use patterns, reducing the effective boom length to less than 3/4 of the wingspan or rotor length may further reduce drift without reducing swath width.
- **Application Height** - Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.
- **Swath Adjustment** - When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downward edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.)

BOOM HEIGHT

Setting the boom at the lowest labeled height (if specified) which provides uniform coverage reduces the exposure of droplets to evaporation and wind. For ground equipment, the boom should remain level with the crop and have minimal bounce.

WIND

Drift potential is lowest between wind speeds of 3-10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 3 mph due to variable wind direction and high inversion potential. **AVOID GUSTY OR WINDLESS CONDITIONS.**

Note: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

TEMPERATURE AND HUMIDITY

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

TEMPERATURE INVERSIONS

Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain close to the ground and move laterally in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly

dissipates indicate good vertical air mixing.

SENSITIVE AREAS

The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from the sensitive areas).

SHIELDED SPRAYERS

Shielding the boom or individual nozzles can reduce the effects of wind. However, it is the responsibility of the applicator to verify that the shields are preventing drift and not interfering with uniform deposition of the product.

AIR ASSISTED (AIR BLAST) FIELD CROP SPRAYERS

Air assisted field crop sprayers carry droplets to the target via a downward directed air stream. Some may reduce the potential for drift, but if a sprayer is unsuitable for the application and/or set up improperly, high drift potential can result. It is the responsibility of the applicator to determine that a sprayer is suitable for the intended application, is configured properly, and that drift is not occurring.

Note: Air assisted field sprayers can affect product performance by affecting spray coverage and canopy penetration. Consult the application equipment section of this label to determine if use of an air assisted sprayer is recommended.

AIR ASSISTED (AIR BLAST) TREE AND VINE SPRAYERS

Air assisted tree and vine sprayers carry droplets into the canopy of trees and vines via a radially or laterally directed air stream. These sprayers are not suitable for applying herbicides. In addition to the general drift management principles already described, the following specific practices will further reduce the potential for drift:

Adjust deflectors and aiming devices so that spray is only directed into the canopy.

Block off upward pointed nozzles when there is no overhanging canopy.

Use only enough air volume to penetrate the canopy and provide good coverage.

Do not allow spray to go beyond the edge of the cultivated area. Spray the outside row only from outside the planting.

CROP AND RATE CHARTS

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Alfalfa	Pea Aphid Lygus Bugs Blotch Leafminer Aphids Egyptian Alfalfa Weevil Larvae Loopers Beet Armyworm Armyworm Alfalfa Caterpillar Fall Armyworm Western Yellowstriped Armyworm Yellowstriped Armyworm	1/2 – 1	7 *	48 hrs
	Alfalfa Weevil Larvae	1		
	Variegated Cutworm	1/4 - 1		
	Do not apply to dormant or semi-dormant alfalfa when min. daily temp. is 50° F, or lower. Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. * Do not apply within 7 days of cutting or allowing livestock to graze.			
Anise (Fennel)	Cabbage Looper	1	7	48 hrs
	Beet Armyworm	1/2 - 1		
Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop				
Apple(Ground application only)	Apple Aphid Rosy Apple Aphid Tufted Apple Budmoth Green Fruitworm Tarnished Plant Bug	1/2 - 1 *	14	72 hrs
	Codling Moth (10-12 day spray intervals)			
	Leafrollers (Fruit-tree, Obliquebanded, Redbanded, Variegated) Lesser Appleworm White Apple Leafhopper Tentiform Leafminer Cutworm	1 *		
Do not use on Early Macintosh & Wealthy varieties Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 5 applications per crop; minimum interval between treatments is 7 days. * Apply in a minimum of 50 gallons of water per acre.				

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Asparagus	Beet Armyworm, Western Yellowstriped Armyworm Asparagus Beetle Spotted Asparagus Beetle White Cutworm Redbacked Cutworm	1/2 - 1	1	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Avocado	Western Avocado Leafroller Omnivorous Looper	1/2 - 1	1	48 hrs
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Barley	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).			
Beans (Succulent) Including: Kidney, Lima, Mung, Navy, Pinto, Snap, Wax, Broad, Fava, Asparagus, Blackeyed peas Cowpeas, Chick peas, Garbanzo beans, Sweet lupine, White sweet lupine White lupine,	Leafhopper Mexican Bean Beetle	1/4 - 1	Succulent Beans 1/4 - 1/2 lb.-- 1, over 1/2 lb. -- 3; 3 Vines 7 Hay	48 hrs
	Fall Armyworm Variegated Cutworm	1/2		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Grain lupine	Beet Armyworm Corn Earworm Saltmarsh Caterpillar, Yellowstriped Armyworm Western Yellowstriped Armyworm, Lygus Bugs Thrips Aphids Loopers*	1/2 – 1		
	European Corn Borer (Ovicide & Larvicide)-- Initiate when moth flights first appear and-continue preventive treatments at 3-4 day intervals to control eggs and larvae			
	Spotted Cucumber Beetle	1/4 – 1/2		
	Succulent Beans - Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. * Do not use for Loopers in AL & GA.			
Beans (Dry) (Follow Beans, Succulent)	(Follow Beans, Succulent)	(Follow Beans, Succulent)	14 - Dry Beans * 14 - Vines * 14 - Hay *	48 hrs
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting.			
Beets (Table)	Imported Cabbageworm	1/4 - 1	0 - roots 10 - tops	48 hrs
	Beet Armyworm Cabbage Looper Diamondback Moth	1/2 - 1		
	Cucumber Beetle Variegated Cutworm	1/2		
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Bermudagrass pasture	Fall Armyworm Armyworm Striped Grass Looper	1/4 - 1	7 - Forage * 3 - Dehydrated Hay **	48 hrs
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. * Do not apply within 7 days of feeding forage or allowing livestock to graze. ** Do not apply within 3 days of cutting for hay.			
Blueberries	Blueberry Leafhopper Aphids Tussock Moth Weevil Sharp-Nosed Leafhopper	1/2	3	48 hrs

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
	Cranberry Fruitworm* Cherry Fruitworm*	1/2 - 1		
	Flea Beetle (larvae) Sawfly (larvae) Blueberry Leafroller	1		
	Blueberry Maggot	1/4 - 1/2		
	Do not apply during bloom. Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than applications per crop. * For ground use only.			
Broccoli	Loopers, Diamondback Moth	1/2 - 1 **	3	48 hrs
	Imported Cabbageworm	1/4 - 1 **		
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. ** Add a wetting agent to improve coverage.			
Brussels Sprouts	Loopers Imported Cabbageworm, Diamondback Moth	1/2 - 1 **	3	48 hrs
	Variegated Cutworm	1/2 **		
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. ** Add a wetting agent to improve coverage			
Cabbage	Loopers * Diamondback Moth Fall Armyworm	1/2 - 1 **	1	48 hrs
	Imported Cabbageworm	1/4 - 1 **		
	Variegated Cutworm	1/2 **		
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 15 applications per crop; minimum interval between treatments is 2 days. * Do not use for Loopers in AL & GA. ** Add a wetting agent to improve coverage			
Carrot	Beet Armyworm Armyworms Aster Leafhopper	1/2 - 1	1	48 hrs
	Variegated Cutworm	1/4 - 1/2		
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Cauliflower	Imported Cabbageworm	1/4 - 1 **	3	48 hrs
	Loopers Diamondback Moth	1/2 - 1 **		
	Variegated Cutworm	1/2 **		
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. ** Add a wetting agent to improve coverage.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Celery	Beet Armyworm Aster Leafhopper	1/2 - 1	7	48 hrs
	Loopers	1		
	Variegated Cutworm	1/2		
	Armyworms	1/4 - 1		
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Chicory	Beet Armyworm Variegated Cutworm Leafhoppers	1/2 - 1	80	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Chinese Cabbage	Loopers Beet Armyworm	1/2 - 1*	10	48 hrs
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP/acre/crop. Do not make more than 10 applications/crop. * Minimum of 25 gallons water per acre by ground or 5 gallons by air.			
Collards (Fresh market only)	Diamondback Moth Variegated Cutworm	1/2	10	48 hrs
	Imported Cabbageworm Beet Armyworm Loopers*	1/2 - 1		
	Do not apply when temperature is less than 50° F. Do not apply when crop is less than 10" tall. Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop. * Do not use for Loopers in AL & GA.			
Corn (Field, Popcorn & Seed)	Earworm (Ovicide/Larvicide) Armyworm Fall Armyworm European Corn Borer- Ears 1-3 days or as needed Corn Rootworm (adult beetles) Flea Beetles Picnic Beetles Aphids	1/4 - 1/2	21- Ears 3 - Forage* 21 - Stover*	48 hrs
	Variegated Cutworm, Beet Armyworm	1/2		
	Do not apply more than 2.5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. *Corn forage is green actively growing plants that are harvested with the ears intact, then plants can be fed directly to animals or used to make silage. Corn stover are the parts of the plant that remain after removal of the grain at full plant maturity. These remaining stalks and leaves can be fed as roughage to animals.			
Corn (Sweet)	Earworm-Whorl as needed	1/3 - 1/2	0 - Ears 3 - Forage 21- Stover	48 hrs
	Fall Armyworm Armyworm Earworm,- (Ovicide/Larvicide)	1/4 - 1/2		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
	European Corn Borer- Ears 1-3 days or as needed Corn Rootworm (adult beetles) Flea Beetles Picnic Beetles Aphids			
	Variegated Cutworm Beet Armyworm	1/2		
	Certain hybrid varieties of sweet corn are susceptible to methomyl injury. Treat a small area to determine crop safety before full scale spraying. Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 28 applications per crop; minimum interval between treatments is 1 day.			
Cotton All U.S.	Ovicide/Larvicide - Bollworm, Tobacco Budworm (Initiate schedule when significant numbers of eggs are present. Continue at 3 to 5-day intervals while eggs are present and larval control is adequate. If significant larvae survive, use higher rates below.) Lygus Bugs/Plant Bugs (adults and nymphs) start treatment on low level population for suppression.	1/8 - 1/4 (see Insect Predator Section)	15	72 hrs
	Cotton Leafworm	1/4 - 1/2		
	Cotton Fleahopper (as needed)	1/8 - 1/4		
	Aphids, Thrips	1/4		
	(Early Season) Bollworm, Tobacco Budworm, Beet Armyworm, Cotton Leafperforator, Fall Armyworm, Lygus Bugs/Plant Bugs (adults and nymphs) Use as occasional spray in regular schedule but not more often than every 10 days.	1/2		
East of Rockies Only				
East of Rockies	(Late Season)	1/2 - 3/4	15	72 hrs

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Only	Bollworm, Tobacco Budworm, Beet Armyworm, Cotton Leafperforator, Fall Armyworm, Lygus Bugs/Plant Bugs (adult and nymphs). Up to 3 applications at 3-5 day intervals after desired boll load set on plants.			
Texas	Cotton Aphid	1/4 - 2/3		
West of Rockies only	Larvicide for worms Bollworm, Fall Armyworm, Tobacco Budworm, Lygus Bugs Beet Armyworm	1/2 - 3/4		
	Cotton Leafperforator	1/3 - 3/4		
	For applications West of the Rockies, make applications on 3-5 day intervals after desired boll load set on plants. For all cotton applications: Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop . Use may redden cotton. If excessive stop or alternate with other insecticides. Do not graze or feed.			
Cucumber	Loopers Tobacco Budworm Beet Armyworm, Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickleworm Fall Armyworm	1/2 - 1	1/2 lb. -- 1 Over 1/2 lb.- 3	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 12 applications per crop.			
Eggplant	Green Peach Aphid	1/4 - 1	5	48 hrs
	Tomato Pinworm (Ground Application only) Beet Armyworm Corn Earworm	1/2 - 1		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Endive, Escarole	Beet Armyworm	1/2 - 1	10	48 hrs
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Garlic	Beet Armyworm	1/2 **	7	48 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
	Do not make more than 6 applications per crop. ** Add a wetting agent to improve coverage.			
Grapefruit CA, AZ & HI only	Thrips Fruittree Leafroller Orange Tortrix Western Tussock Moth Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Horseradish Ground application only	Aphids Thrips	1/2	65	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application - Days To Harvest	REI
Leafy Green Vegetables: Beet (tops) Dandelions, Kale, Mustard Greens, Parsley, Swiss Chard, Turnip Greens	Beet Armyworm Cabbage Looper* Diamondback Moth Imported Cabbageworm	1/2 - 1	10	48 hrs
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop . * Do not use for Cabbage Loopers in AL & GA.			
Lemon CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Lentils	Western Yellowstriped Armyworm	1/2 - 1	21	48 hrs
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Lettuce (Head and Leaf varieties)	Alfalfa Looper	1/4 - 1	1/4-1/2 lb. - 7 over 1/2 lb. - 10	48 hrs
	Thrips Aphids Beet Armyworm Cabbage Looper Corn Earworm Aster Leafhopper	1/2 - 1		
	Variegated Cutworm	1/2		
	Lettuce (head varieties) Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 15 applications per crop; minimum interval between treatments is 2 days. Lettuce (leaf varieties) Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop; minimum interval between treatments is 2 days.			
Melons Including: Cantaloupe Casaba Santa Claus melon Crenshaw melon Honeydew melon Honey balls Persian melon Golden Pershaw melon Mango melon Pineapple melon Snake melon Watermelon	Loopers Tobacco Budworm Beet Armyworm Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickleworm Fall Armyworm	1/2 - 1	1/2 lb. -- 1 over 1/2 lb. -- 3	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 12 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application - Days To Harvest	REI
Mint (Peppermint, Spearmint)	Variegated Cutworm Alfalfa Looper	1	14	48 hrs
	Flea Beetles	3/4 - 1		
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Nectarine CA & AZ only	Thrips	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 3 applications per crop.			
Oats	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).			
Onions (Green & Dry Bulb)	Beet Armyworm	1/2 - 1 **	7 - Green and Dry Bulb Onions	48 hrs
	Thrips* Variegated Cutworm Black Cutworm	1 **		
	Onions, green Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop; minimum interval between treatments is 5 days. Onions, dry bulb Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop; minimum treatment interval between treatments is 5 days. *Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation to control thrips. Begin applications before thrip populations reach 3-5 thrips per plant. For best results, add a wetting agent. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. ** Add a wetting agent to improve coverage.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Oranges CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix Fruittree Leafroller Beet Armyworm Citrus Cutworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Peaches	Cattfacing Insects (Plant Bugs and Stink Bugs) - begin at petal fall and continue in cover sprays at 7-to 10-day intervals Oriental Fruit Moth* -begin at petal fall; use trapping devices and frequent field inspection to determine need for treatment. Continue treatment in cover sprays and alternate with residual-type insecticides registered for this use. Green Peach Aphid	1 lb (or 1/4 lb per 100 gal up to 400 gal per acre)	4	4 days
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 6 applications per crop. * Oriental Fruit Moth (Ground Application Only).			
Peanuts	Corn Earworm* Potato Leafhopper Fall Armyworm	1/4 - 1	21	48 hrs
	Beet Armyworm	3/8 - 1		
	Green Cloverworm Velvetbean Caterpillar Cabbage Looper Soybean Looper ** Thrips Granulate Cutworm	1/2 - 1		
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop. * ROTAM METHOMYL 90SP has ovicidal and larvicidal control on corn earworm. **Soybean Looper is difficult to control. Do not apply to worms greater than 1 per 2" long. Use higher rate for severe infestations. Do not feed treated vines.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application - Days To Harvest	REI
Pears Northeast only	Green Fruitworm Oblique banded Leafroller	1/2 - 1 *	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop. * Apply in a minimum of 50 gallons of water per acre.			
Peas (succulent) Including: Pigeon peas Chick peas Garbanzo beans Dwarf peas Garden peas Green peas English Peas Field peas Edible pod peas	Alfalfa Looper Cabbage Looper*	1/2 - 1	1 - Peas 5 - Forage 14 - Hay	48 hrs
	Pea Aphid Beet Armyworm Saltmarsh Caterpillar Variegated Cutworm			
	Alfalfa Caterpillar Armyworm Green Cloverworm	1/4 - 1		
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 6 applications per crop; minimum interval between treatments is 3 days. * Do not use for Cabbage Loopers in AL & GA.			
Pecans Southeast only	Aphids	1/2 - 1	30	48 hrs
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP/acre/crop. Do not make more than 7 applications per crop.			
Peppers Including: Bell Hot Pimentos Sweet	Loopers Beet Armyworm Green Peach Aphid Armyworm Fall Armyworm	1/2 - 1	3	48 hrs
	Variegated Cutworm	1/4 - 1/2		
	European Corn Borer	1		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Pomegranates	Omnivorous Leafroller	1	14	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Potato	Tuberworm* Loopers Aphids Beet Armyworm Leafhoppers Fall Armyworm	1/2 - 1	6	48 hrs
	Variegated Cutworm Flea Beetles	1/2		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Potato (cont.)	<p>Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section.</p> <p>*Repeat applications of ROTAM METHOMYL 90SP on a 5-7 day schedule, or longer as needed, to control tuber worm populations. An application schedule of effective insecticides with different modes of action may be needed to keep foliar feeding larval populations as low as possible prior to harvest to reduce the risk of larval damage to the tubers. Failure to adequately control tuberworm larvae prior to crop senescence or vine kill increases the risk of tuber damage.</p>			
Rye	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs
	<p>Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.</p> <p>Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information.</p> <p>*Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California.</p> <p>**Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).</p>			
Sorghum	Sorghum Webworm	1/2 *	14 **	48 hrs
Including: Sudangrass (Except Sweet Sorghum)	Sorghum Midge --Apply when 50% bloom and 3-5 days later if needed. Fall Armyworm (Budworm) Beet Armyworm Corn Earworm Armyworm	1/4 - 1/2 *		
	<p>Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.</p> <p>* Minimum of 10 gallons per acre by ground or 2 gallons per acre by air.</p> <p>** Do not apply within 14 days of feeding forage or cutting for hay.</p>			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Soybeans	Green Cloverworm Velvetbean Caterpillar Mexican Bean Beetle Corn Earworm Light to Moderate infestations	1/8 - 1/4 (see Insect Predator section)	14 - Soybeans 3 - Forage 12 - Hay	48 hrs
	Moderate to severe infestations	1/4 - 1/2		
	Soybean Aphid	1/6 - 1/3		
	Beet Armyworm Salt Marsh Caterpillar Bean Leaf Beetle Fall Armyworm Thrips Silver Spotted Skipper Light to Moderate infestations	1/4 - 3/8		
	Moderate to severe infestations	3/8 - 1/2		
	Do not apply more than 1.5 pounds of ROTAM METHOMYL 0SP per acre per crop. Do not make more than 3 applications per crop.			
Spinach	Alfalfa Loopers Cabbage Looper Beet Armyworm Fall Armyworm	1/2 - 1	7	48 hrs
	Variegated Cutworm	1/2		
	Do not apply when minimum daily temperature is 32° F, or lower. Do not apply to seedlings less than 3" diameter. Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Sugar Beet	Beet Webworm Flea Beetles Carrion Beetles Beet Armyworm* Aphids* Western Yellowstriped Armyworm*	1/4 - 1	30 -Tops 21 - Roots	48 hrs
	Variegated Cutworm	1/2		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Sugar Beet (cont.)	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. *Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation to control beet armyworm, aphids and western yellowstriped armyworm. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information.			
Summer Squash* Including: Crookneck squash Straightneck squash Scallop squash Vegetable marrow Spaghetti squash Hyotan Cucuzza Hechima Chinese okra Bitter melon Balsam pear Balsam apple Chinese Cucumber	Loopers Tobacco Budworm Beet Armyworm Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickleworm Fall Armyworm	1/2 - 1	1/2 lb. -- 1 day over 1/2 lb.-- 3 days	48 hrs
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 12 applications per crop. *Fruit of the Gourd (Cucurbit accae) family that are consumed when immature, 100% of the fruit is edible cooked or raw, once picked cannot be stored, has a soft rind which is easily penetrated, and if seeds were harvested they would not germinate.			
Tangelo, Tangerine CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix, Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Tobacco (Except shade)	Flea Beetle Hornworm	1/4 - 1/2	5 - Flue cured 14 - Air or fire cured	48 hrs
	Loopers Aphids Tobacco Budworm Fall Armyworm	1/2		
	Do not apply more than 2.5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 5 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Tomato (Including Tomatillos*)	Tomato Fruitworm Aphids Hornworm Loopers Beet Armyworm Southern Armyworm Pinworm Armyworm Fall Armyworm	1/2 - 1	1	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop Do not make more than 16 applications per crop. * For tomatillos do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop . Do not make more than 5 applications per crop.			
Turf (For use on sod farms only)	Sod Webworm (after application, sprinkle irrigate for 15 minutes)	1 (2/5 ozs. per 1000 sq. ft.)		48 hrs
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Do not graze or feed.			
Wheat	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications to s on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).			

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Handle this package carefully to prevent breakage of inner bag when stored at low temperatures. Allow to warm above 50 Deg.F for normal handling. Store product in original container only. Do not contaminate water, other pesticides, fertilizer, food or feed in storage. Not for use or storage in or around the home.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: For Fiber Drums With Liners: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into manufacturing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

For Water Soluble Packets: Do not reuse the outer box or the resealable plastic bag. When all water-soluble packets are used, the outer packaging should be clean and may be disposed of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by open burning. If burned, stay out of smoke. If the resealable plastic bag contacts the formulated product in any way, the bag must be triple-rinsed with clean water. Add the rinsate to the spray tank and dispose of the outer wrap as described above.

For Paper and Plastic Bags: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In the event of a major spill, fire or other emergency, call CHEMTREC Day or Night, 1-800-424-9300.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Rotam Agrochemical Company Limited or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Rotam Agrochemical Company Limited and Seller harmless for any claims relating to such factors.

Rotam Agrochemical Company Limited warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Rotam Agrochemical Company Limited, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW ROTAM LTD MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the extent consistent with applicable law, Rotam Agrochemical Company Limited or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ROTAM AGROCHEMICAL COMPANY LIMITED AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ROTAM AGROCHEMICAL COMPANY LIMITED OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Rotam Agrochemical Company Limited and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of Rotam Agrochemical Company Limited.

Manufactured by:
Rotam Agrochemical Company Ltd.
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong
1-866-927-6826

Registered: [TBA]

RESTRICTED USE PESTICIDE

Due to high Acute Toxicity to Humans

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

GROUP

1A

INSECTICIDE

Rotam Methomyl 90SP Insecticide

In Water Soluble Packets

Active Ingredient	By Weight
Methomyl (S-methyl-N-[(methylcarbamoyl) oxy]thioacetimidate)	90%
Other Ingredients	10%
TOTAL	100%

EPA Reg. No. 83100 - 28

EPA Est. No.: 69821-CHN-005

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Net Contents:
Packets/Container
TBA

Registered: (TBA)

KEEP OUT OF REACH OF CHILDREN

DANGER

POISON



PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

Refer to inside label booklet for additional precautionary information including Personal Protective Equipment (PPE), User Safety Recommendations, Engineering Controls Statements, Environmental Hazards and Directions For Use.

FIRST AID

(N-Methyl Carbamate insecticide)

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

ATROPINE IS AN ANTIDOTE --SEEK MEDICAL ATTENTION AT ONCE IN ALL CASES OF SUSPECTED POISONING.

If poisoning symptoms appear (see POISONING SYMPTOMS), get medical attention.

POISONING SYMPTOMS — Methomyl poisoning produces effects associated with anticholinesterase activity which may include weakness, blurred vision, headache, nausea, abdominal cramps, discomfort in the chest, constriction of pupils, sweating, slow pulse, muscle tremors. If poisoning symptoms appear, refer to First Aid section and seek medical attention at once.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

TREATMENT — Atropine sulfate should be used for treatment. Administer repeated doses, 1.2 to 2.0 mg. intravenously every 10 to 30 minutes until full atropinization is achieved. Maintain atropinization until the patient recovers. Artificial respiration or oxygen may be necessary. Allow no further exposure to any cholinesterase inhibitor until recovery is assured.

Do not use 2-PAM for exposure to ROTAM METHOMYL 90SP alone. However, for exposure to combinations of ROTAM METHOMYL 90SP and organophosphorous insecticides, 2-PAM may be used as required to supplement the atropine sulfate treatment. Do not use morphine.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

You may also contact the National Poison Control Center 24-hr Emergency Hotline at: 1-800-222-1222.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Restricted Use Pesticide due to toxicity categories. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

Fatal if swallowed. May be fatal if inhaled or gets in eyes. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Do not breathe dust. Remove and wash contaminated clothing before reuse. Avoid contact with clothing. Do not get in eyes. Wear protective eyewear. Wear: Long-sleeved shirt and long pants, socks, chemical-resistant shoes, and chemical-resistant gloves (such as barrier laminate or butyl rubber).

For handling activities, use a non-powered air purifying respirator equipped with an N-, R-, or P- series filter.

—insert PPE

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, and mammals. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high-water mark. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area. This chemical is known to leach through soil into groundwater under certain conditions as a result of label use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

This chemical can contaminate surface water through spray drift. Under some conditions, it may also have a high potential for runoff into surface water for several days to weeks after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, and areas overlaying extremely shallow groundwater, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas over-laying tile drainage systems that drain to surface water.

PHYSICAL AND CHEMICAL HAZARDS

Keep container closed. Use with adequate ventilation.

STORAGE AND DISPOSAL

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Day or Night, 1-800-424-9300.**

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Net Contents:
Packets/Container
TBA



Rotam Methomyl Labels 83100-27 & 83100-28

Frank Sobotka o Thomas Harris
:

04/04/2011 01:09 PM

I revised the two end use labels per your instructions over the weekend and am sending for your review.
See Attached.

Dr. Frank E. Sobotka, Senior Partner
IPM Resources LLC
4032 Crockers Lake Blvd.
Suite 818
Sarasota, FL 34238
PH: 215 497-9501
FX: 215 497-9502




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083100-0028.20110404.Primary Lbl.pdf



detailed review for 83100-EI 

t
Thomas Harris o Frank Sobotka
:

04/01/2011 02:40 PM

Dr. Sobotka,

Here's the detailed review for 83100-EI. Some similar formatting changes but not as many text changes as with -ET; this one will be a little faster but do -ET first. Again, copy/paste/edit Storage Disposal from Dupont.



print image (just print) 083100-000EI.20110308.90SP Primary.EPA COMMENTS.print image.pdf



"live" .pdf 083100-000EI.20110308.90SP Primary.EPA COMMENTS.pdf



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Tom Harris
EPA/OCSP/OPP/RD/IRB
voice: (703) 308-9423
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harris.thomas@epa.gov
visit <http://www.epa.gov/pesticides>

[Front Container Label – Optional if Booklet is used as front container label]

RESTRICTED USE PESTICIDE

Due to High Acute Toxicity to Humans

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

GROUP 1A INSECTICIDE

Rotam Methomyl 90SP Insecticide In Water Soluble Packets

Active Ingredient	
Methomyl	
(S-methyl-N-[(methylcarbamoyl)oxy]thioacetimidate)	90%
Inert Ingredients	10%
TOTAL	100%

EPA Reg. No. 83100 - TBA

EPA Est. No.: TBA

**KEEP OUT OF REACH OF CHILDREN
DANGER POISON**



PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See additional Precautionary Statements on inside booklet and back panel of container and Directions for Use on inside booklet.

Manufactured by:
Rotam Agrochemical Company Ltd.
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong
1-866-927-6826

**Net Contents:
Packets/Container**

Summary of Comments on [Directions for use booklet]

Page: 1

Author: thari02 Subject: Replacement Text Date: 4/1/2011 1:15:29 PM
replace with: "Other ingredients"

Author: thari02 Date: 4/4/2011 5:45:21 PM
083100-000EI.20110308.90SP Primary.EPA COMMENTS.pdf

083100-000EI.20110308.90SP Primary.EPA COMMENTS.pdf

[Booklet Cover]

PULL HERE TO OPEN▶

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GROUP 1A INSECTICIDE

Rotam Methomyl 90SP Insecticide In Water Soluble Packets

KEEP OUT OF REACH OF CHILDREN
DANGER POISON



PELIGRO

move ingredient
section from next
page to here

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID

(N-Methyl Carbamate Insecticide)

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

ATROPINE IS AN ANTIDOTE. SEEK MEDICAL ATTENTION AT ONCE IN ALL CASES OF SUSPECTED POISONING.

If poisoning symptoms appear (see POISONING SYMPTOMS), get medical attention. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

move poisoning symptoms and note to
physician to here at end of first aid

Page: 2

Author: tharri02 Subject: Callout Date: 4/1/2011 2:22:03 PM

move ingredient section from next page to here

Author: tharri02 Subject: Callout Date: 4/1/2011 1:19:57 PM

move poisoning symptoms and note to physician to here at end of first aid

[Booklet Cover Continued]

insert:
"DANGER skull/crossbones POISON
PELIGRO"

**PRECAUTIONARY
HAZARDS TO
AND DOMESTIC ANIMALS**

move to below
First Aid

DANGER. FATAL IF SWALLOWED. MAY BE FATAL IF INHALED OR GETS IN EYES. DO NOT BREATHE DUST OR SPRAY MIST. Do not get in eyes or on clothing. ~~Wear protective eyewear and respirator.~~ Harmful if absorbed through skin. Avoid contact with skin. Wash hands thoroughly with soap and water after handling.

POISONING SYMPTOMS: Methomyl poisoning produces effects associated with anticholinesterase activity which may include weakness, blurred vision, headache, nausea, abdominal cramps, discomfort in the chest, constriction of pupils, sweating, slow pulse, muscle tremors. If poisoning symptoms appear, refer to First Aid section on the ROTAM METHOMYL 90SP label and seek medical attention at once.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

TREATMENT: Atropine sulfate should be used for treatment. Administer repeated doses, 1.2 to 2.0 mg. intravenously every 10 to 30 minutes until full atropinization is achieved. Maintain atropinization until the patient recovers. Artificial respiration or oxygen may be necessary. Allow no further exposure to any cholinesterase inhibitor until recovery is assured.

Do not use 2-PAM for exposure to ROTAM METHOMYL 90SP alone. However, for exposure to combinations of ROTAM METHOMYL 90SP and organophosphorous insecticides, 2-PAM may be used as required to supplement the atropine sulfate treatment. Do not use morphine.

Page: 3

Author: thari02 Subject: Callout Date: 4/1/2011 1:21:14 PM

insert:
"DANGER skull/crossbones POISON
PELIGRO"

in red

Author: thari02 Subject: Text Box Date: 4/1/2011 1:16:27 PM

move to below First Aid

Author: thari02 Subject: Cross-Out Date: 4/1/2011 1:32:42 PM
DELETE here; goes with PPE

Author: thari02 Subject: Pencil Date: 4/1/2011 1:16:07 PM

Author: thari02 Subject: Text Box Date: 4/1/2011 1:22:39 PM
move ingredients to previous page

Author: thari02 Subject: Pencil Date: 4/1/2011 1:21:52 PM

Author: thari02 Subject: Replacement Text Date: 4/1/2011 1:17:00 PM
replace with "Other ingredients"

move ingredients
to previous page

Refer to inside label booklet for additional precautionary information including Personal Protective Equipment (PPE), User Safety Recommendations, Engineering Controls Statements, Environmental Hazards and Directions For Use.

Water Soluble Powder In Water Soluble Bags

Active Ingredient

Methomyl

(S-methyl-N-[(methylcarbamoyl)
oxy]thioacetimidate)

90%

Inert Ingredients

10%

TOTAL

100%

EPA Reg. No. 83100 - TBA

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**Net Contents:
Packets/Container**

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Agricultural Use Requirements	
General Information	
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Insect Predators	
Resistance	
Compatibility	
Integrated Pest Management	
Spray Preparation	
Application	
Spray Drift Management	
Crop and Rate Tables	
Storage and Disposal	
Notice of Warranty	

[move table of contents to after Precautionary Statements but before Directions for Use; delete references to first aid and prec. stmts]
could list individual crops, if desired]

[move table of contents to after Precautionary Statements but before Directions for Use; delete references to first aid and prec. stmts]
could list individual crops, if desired]

PRECAUTIONARY STATEMENTS (Continued)
HAZARDS TO HUMAN AND DOMESTIC ANIMALS
DANGER

PERSONAL PROTECTIVE EQUIPMENT
Applicators and others exposed to the diluted spray solution must wear:

- Long-sleeved shirt and long pants.
- Chemical-resistant gloves such as barrier laminate or butyl rubber.
- Shoes plus socks.
- Protective eyewear.

Mixers, loaders, cleaners, repairers of application equipment, and others exposed to the concentrate must wear:

- Long sleeve shirt and long pants.
- Chemical-resistant gloves, such as barrier laminate or butyl rubber.
- Socks and chemical resistant footwear.
- Protective eyewear.
- Respirator as outlined below.
- Chemical resistant apron.

For exposures in enclosed areas, a respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or a canister with any R, P, or HE prefilter.

For exposures outdoors, a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any R, P, or HE prefilter. Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROL STATEMENTS

Human flaggers must be in enclosed cabs.

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR part 170.240 (d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

The enclosed cabs must be used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR part 170.240 (d)(4-6)]. The handler PPE requirements may be reduced or modified as specified in the WPS.

Water soluble packets when used correctly qualify as a closed loading system under the WPS. Handlers handling this product while it is enclosed in intact water-soluble packets are permitted to wear long-sleeved shirt, long pants, shoes plus socks, chemical-resistant gloves, and chemical-resistant apron, provided the other required PPE is immediately available in case the bag is opened.

Pilots must not assist in the mixing and loading operations.

Author: tharri02	Subject: Cross-Out	Date: 4/1/2011 1:23:31 PM
don't need signal word here since this is just precautionary section continued		
Author: tharri02	Subject: Cross-Out	Date: 4/1/2011 1:38:18 PM
DELETE data not submitted to support this		
Author: tharri02	Subject: Replacement Text	Date: 4/1/2011 1:39:58 PM
INSERT so reads: "..., loaders, applicators, ..."		
Author: tharri02	Subject: Replacement Text	Date: 4/1/2011 1:40:39 PM
INSERT carriage return so "Discard ..." starts new paragraph.		

USER SAFETY RECOMMENDATIONS**Users Should:**

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove personal protective equipment immediately after handling this product.
- Wash the outside of gloves before removing.
- As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, and mammals. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high-water mark. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area. This chemical is known to leach through soil into groundwater under certain conditions as a result of label use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

This chemical can contaminate surface water through spray drift. Under some conditions, it may also have a high potential for runoff into surface water for several days to weeks after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, and areas overlaying extremely shallow groundwater, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas over-laying tile drainage systems that drain to surface water.

PHYSICAL AND CHEMICAL HAZARDS

Keep container closed. Use with adequate ventilation.

DIRECTIONS FOR USE
Restricted Use Pesticide

Insert Table of contents here at start of DFU, if used

It is a violation of federal law to use this product in a manner inconsistent with labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI). REI Summary: ~~REI grapes = 7 day~~; REI peaches = 4 day; REI apple, cotton, grapefruit, lemon, nectarine, orange, tangelo, tangerine = 5 day; all other WPS uses = 48 hour REI.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical Resistant Gloves Category A (such as butyl rubber, natural rubber, neoprene rubber or nitrile rubber), all >14 mils
- Shoes plus socks
- Protective eyewear

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

~~Notify workers of the application to grapes by warning them orally and by posting warning signs at entrances to treated areas.~~

GENERAL INFORMATION

Chemigation: Overhead sprinkler chemigation is allowed for use in alfalfa, barley, oats, onions, potatoes, rye, sugar beets, and wheat. Refer to supplemental, or Special Local Need (SLN) labeling or the crop specific sections of this label for use directions for chemigation. Do not apply this product through any other type of irrigation systems, except those allowed by instructions provided in a supplemental, SLN or this product label.

Do not formulate this product into other End-use products without written permission from Rotam.









ROTAM METHOMYL 90SP insecticide should be used only in accordance with directions for use on this label or in separate Rotam supplemental labeling. Rotam will not be responsible for use of the product in a manner not specified by label in the product's labeling and User assumes all risk for such use.

ROTAM METHOMYL 90SP is a dry powder to be dissolved in water for application by mechanical ground, overhead sprinkler, or aerial application. Hand-held equipment is prohibited for application to crops.

Do not apply by ground equipment within 25 feet, or by air within 100 feet of lakes, reservoirs, rivers, estuaries, commercial fish ponds and natural, permanent streams, marshes or natural, permanent ponds. Increase the buffer zone to 450 feet from the above aquatic areas when ultra low volume application is made.

Pilots must not assist in the mixing and loading operations.

Page: 7

	Author: thm02	Subject: Cross-Out	Date: 4/1/2011 1:25:53 PM
	DELETE		
	Author: thm02	Subject: Cross-Out	Date: 4/1/2011 1:26:20 PM
	DELETE		
	Author: thm02	Subject: Replacement Text	Date: 4/1/2011 1:46:18 PM
	replace with:		
		"APPLICATION INFORMATION" or just leave out. do not use word "general"	
	Author: thm02	Subject: Pencil	Date: 4/1/2011 1:47:02 PM
	Author: thm02	Subject: Text Box	Date: 4/1/2011 1:46:40 PM
	move to chemigation section		

move to
chemigation
section

Use only in commercial and farm plantings. Not for use in home plantings. Not for use during any period after a commercial crop site is opened for public entry as a "U-Pick", "Pick Your Own" or similar operation; in no case shall preharvest applications be made after first public entry. The restricted entry interval and preharvest interval for the crop stated elsewhere on this label must be followed.

Page: 8

Author: thari02 Subject: Pencil Date: 4/1/2011 1:47:26 PM

SCOUTING

Monitor insect populations to determine whether or not there is a need for application of ROTAM METHOMYL 90SP based on locally determined economic thresholds. More than one treatment of ROTAM METHOMYL 90SP may be required to control a population of pests.

Author: thari02 Subject: Text Box Date: 4/1/2011 1:47:52 PM

ok here but better following IPM section

ok here but better following IPM section

NEFICIAL ANTHROPODS

TAM METHOMYL 90SP at rates of 1/8 to 1/4 lb. per acre helps conserve certain beneficials, including big-eyed bugs, damsel bugs, flower bugs and spiders in cotton and soybeans. While these beneficials cannot be relied upon to control pests, they are of potential value and should be monitored along with pests in pest management programs on these crops.

RESISTANCE MANAGEMENT

For resistance management, ROTAM METHOMYL 90SP insecticide is a group 1A insecticide. Repeated and exclusive use of ROTAM METHOMYL 90SP or other group 1A insecticides may lead to the build-up of resistant strains of insects in some crops. Not all members of this group have been shown to be cross-resistant. Different resistance mechanisms that are not linked to target site of action, such as enhanced metabolism, are common for this group of chemicals. Alteration of compounds from different sub-groups within this group may be an acceptable part of an integrated pest management program.

Some insects are known to develop resistance to products used repeatedly for control. When this occurs, the recommended dosages fail to suppress the pest population below the economic threshold. Because the development of resistance cannot be predicted, the use of this product should conform to resistance management strategies established for the use area. These strategies may include incorporation of cultural and biological control practices, alternation of active classes of insecticides on succeeding generations and targeting the most susceptible life stage. Consult your local or state agricultural authorities for details.

If resistance to this product develops in your area, this product, or other products with a similar mode of action, may not provide adequate control. If poor performance cannot be attributed to improper application or extreme weather conditions, a resistant strain of insect may be present. If you experience difficulty with control and resistance is a reasonable cause, immediately consult your local company representative or agricultural advisor for the best alternative method of control for your area. For additional information on insect resistance monitoring, visit the Insecticide Resistance Action Committee (IRAC) on the web at <http://www.irac-online.org>.

INTEGRATED PEST MANAGEMENT

This product should be used as part of an Integrated Pest Management (IPM) program which can include biological, cultural, and genetic practices aimed at preventing economic pest damage. Application of this product should be based on IPM principles and practices including field scouting or other detection methods, correct target pest identification, population monitoring, and treating

when target pest populations reach locally determined action thresholds. Consult your state cooperative extension service, professional consultants or other qualified authorities to determine appropriate action treatment threshold levels for treating specific pest/crop systems in your area.

SPRAY PREPARATION

Spray equipment must be clean and free of previous pesticide deposits before applying ROTAM METHOMYL 90SP.

Fill spray tank 1/4 to 1/2 full of water. Add ROTAM METHOMYL 90SP directly to spray tank. Carefully open the outer barrier bag containing ROTAM METHOMYL 90SP in a water soluble bag. Do not cut open the outer barrier bag. Invert the outer barrier bag allowing the inner water soluble bag to fall directly into the spray tank. Do not allow packets to become wet prior to adding to the spray tank. Do not handle, open, rip, tear, cut or perforate the inner water soluble bag. Mix thoroughly to fully dissolve the insecticide; once dissolved continued agitation is not required. Use mechanical or hydraulic means; do not use air agitation. Be sure the soluble packet is completely dissolved before adding any other ingredients. Spray mix should not be stored overnight in spray tank.

Compatibility: Since formulations may be changed and new ones introduced, it is recommended that users premix a small quantity of a desired tank mix and observe for possible adverse changes (settling out, flocculation, etc.). Avoid mixtures of several materials and very concentrated spray mixtures.

Do not use ROTAM METHOMYL 90SP with Bordeaux mixture (copper sulfate and hydrated lime), Du Ter triphenyltin hydroxide, lime sulfur, Rayplex iron or in highly alkaline solutions. Use mildly alkaline mixtures immediately after mixing to prevent loss of insecticidal activity.

Tank-mix solutions containing Boron may affect solubility of the water soluble film. When using Boron containing solutions in a tank-mix, follow these procedures:

- Add the correct amount of ROTAM METHOMYL 90SP water soluble packets first
- Be sure the soluble packets are completely dissolved
- Introduce Boron containing solutions last

If the above procedure cannot be followed, and Boron is an essential part of the spray mix, substitute ROTAM METHOMYL LV formulation for the water soluble packets.

Tank Mix Sequence: Add different formulation types in the sequence indicated below. Allow time for complete mixing and dispersion after addition of each product.

1. ROTAM METHOMYL 90SP and other products in water soluble bags.
2. Water dispersible granules
3. Wettable powders
4. Water based suspension concentrates
5. Water soluble concentrates
6. Oil based suspension concentrates
7. Emulsifiable concentrates
8. Adjuvants, surfactants, oils
9. Soluble fertilizers
10. Drift retardants

Follow local practice and manufacturer's recommendation.

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APPLICATION

Apply at the recommended rates when insect populations reach locally determined economic thresholds. Consult the cooperative extension service, professional consultants or other qualified authorities to determine appropriate threshold levels for treatment in your area.

Follow-up treatments of ROTAM METHOMYL 90SP should be applied, as needed, to keep pest populations within threshold limits. On most crops, ROTAM METHOMYL 90SP should be applied at 5 to 7 day intervals to maintain control. Refer to crop specific directions for use in the crop tables for more specific information on treatment intervals.

Use sufficient water to obtain thorough, uniform coverage. Since ROTAM METHOMYL 90SP is a fast acting contact insecticide, best results follow direct spraying of the target insect.

For aerial, use a minimum of 2 gals. per acre (gpa) except 10 gpa for ~~grapes~~, peaches, and nectarines; 15 gpa for oranges, lemons, grapefruit, tangelos and tangerines.

For certain crops a minimum of 1 gallon per acre may be used providing the following conditions are met:

- equipment is adjusted to distribute spray uniformly over the spray swath,
- wind conditions and other factors such as temperature and humidity are such that the spray is delivered to the target area,
- local regulations do not prohibit low-volume aerial sprays,
- use rates are applied as directed on the package label or supplemental labeling for the following crops:

Alfalfa	Celery	Peas (succulent)
Anise	Collards	Peppermint
Asparagus	Corn	Peppers
Barley	Cotton	Potato
Beans	Cucumber	Rye
Broccoli	Lettuce	Soybean
Brussels sprouts		Melons
Cabbage	Mint	Spinach
Carrot	Oats	Sugar beet
Cauliflower	Peanuts	Summer Squash
		Wheat

Apply the low rates on small plants, small insects and light infestations of insects. Use intermediate rates on large insects and heavier infestations of insects. Use 1 to 3 applications of the highest recommended rate for controlling severe infestations. Thereafter, use the lowest rate possible to maintain control.

SPRAY TANK CLEANOUT

Immediately following application, thoroughly clean all spray equipment to reduce the risk of forming hardened deposits which might become difficult to remove.

Drain spray equipment. Thoroughly rinse sprayer and flush hoses, boom and nozzles with clean water.

Clean all other associated application equipment. Take all necessary safety precautions when cleaning equipment. Do not clean near wells, water sources or desirable vegetation. Dispose of waste rinse water in accordance with local regulations.

CHEMIGATION

Instructions for the Use of ROTAM METHOMYL 90SP on Alfalfa, Barley, Oats, Green and Dry Bulb Onions, Potatoes, Rye, Sugar Beets and Wheat

Page: 10

Author: tharri02 Subject: Cross-Out Date: 4/1/2011 1:26:46 PM
DELETE

Author: tharri02 Subject: Replacement Text Date: 4/1/2011 1:55:40 PM
move melons to middle column

Using Overhead Sprinkler Chemigation

Overhead chemigation applications offer the advantage of greater penetration and coverage of the target plant. However, typical chemigation applications are more dilute than ground or aerial applications. For best results, it is recommended to keep the concentration of ROTAM METHOMYL 90SP as high as possible in the application. Apply ROTAM METHOMYL 90SP in 0.1 to 0.2 inches of water per acre. ROTAM METHOMYL 90SP is most active as a contact insecticide, although it does also have activity via ingestion of treated plants. For best results, applications of ROTAM METHOMYL 90SP should take place when the insects are active and most likely to come into direct contact with the application.

Types of Irrigation Systems

ROTAM METHOMYL 90SP may be applied through overhead sprinkler irrigation systems for control of various pests. Center pivot and lateral move irrigation systems are preferred. Other overhead sprinkler systems; such as end tow, side (wheel) roll and solid set, may be used if they provide uniform water distribution. Do not use filter screens smaller than 50 mesh throughout the system, due to possible build up of material on 100 mesh or smaller screens. Do not apply ROTAM METHOMYL 90SP through any other type of irrigation systems, except those allowed by instructions provided in a supplemental, SLN, or this product label.

General Directions for Chemigation

Preparation

A pesticide tank is recommended for the application of ROTAM METHOMYL 90SP in chemigation systems. Thoroughly clean the injection system and tank of any fertilizer or chemical residues using a standard clean-out procedure. Dispose of any residues in accordance with State and Federal laws. Add 1/4 to 1/2 of the desired amount of water and then measure the required amount of ROTAM METHOMYL 90SP into the tank. Complete filling the tank by adding the required amount of water. Agitate thoroughly to insure a uniform solution of ROTAM METHOMYL 90SP. Once in solution, no further agitation is required. Injection solution should not be stored overnight. Highly alkaline water should be buffered so that the pH of the spray solution is in the range of neutral to slightly acidic (pH5-7)

Injection Into Chemigation Systems

Inject the proper amount of the ROTAM METHOMYL 90SP solution to the irrigation water flow using a positive displacement injection pump. Injection should occur at a point in the main irrigation water flow to ensure thorough mixing with the irrigation water. For continuously moving systems, inject the solution containing ROTAM METHOMYL 90SP into the irrigation water line continually and uniformly throughout the irrigation cycle. Apply in no more than 0.2 inches of water per acre. For overhead sprinkler systems that are stationary, add the solution containing ROTAM METHOMYL 90SP to the irrigation water line, and apply no more than 0.2 inches of water per acre, just before the end of the irrigation cycle.

Uniform Water Distribution

The irrigation system used for application of ROTAM METHOMYL 90SP must provide for uniform distribution of ROTAM METHOMYL 90SP treated water. Non-uniform distribution might result in crop injury, lack of effectiveness or illegal pesticide residues in or on the crop being treated. Ensure the irrigation system is calibrated to uniformly distribute the chemigation application to the crop. Contact the equipment manufacturer, the local University Extension agent or other

This page contains no comments

experts if you have questions about achieving uniform distribution of the application.

Equipment Calibration

Calibrate the irrigation system and injector before applying ROTAM METHOMYL 90SP. Calibrate the injection pump while the system is running using the expected irrigation rate. If you have questions about calibration, you should contact your state extension service specialists, equipment manufacturer or other experts.

Monitoring of Chemigation Applications

A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of a responsible person, shall shut the system down and make necessary adjustments should the need arise. Wear the personal protective equipment as defined in the PPE section of the label for cleaners and repairers of application equipment when making adjustments or repairs on the chemigation system when ROTAM METHOMYL 90SP is in the irrigation water.

Required System Safety Devices

Do not connect any irrigation system used for pesticide applications to a public water system unless the pesticide label-prescribed safety devices are in place. Public water system means a system for the provision to the public of piped water for human consumption, if such a system has at least 15 service connections or regularly serves an average of at least 25 individuals at least 60 days out of the year.

1. The system must contain a functional check valve, vacuum relief valve and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.
2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
5. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
6. Systems must use a metering pump such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
7. Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, backflow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, the water from the public water system should be discharged into a reservoir tank prior to pesticide introduction. There shall be a complete physical break (air gap) between the outlet end of the fill pipe and the top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.

Posting of Areas to be Treated

Posting of areas to be chemigated is required when 1) any part of a treated area

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is within 300 feet of sensitive areas such as residential areas, labor camps, businesses, daycare centers, hospitals, in-patient clinics, nursing homes, or any other public areas such as schools, parks, playgrounds, or other public facilities not including public roads, or 2) when the chemigated area is open to the public such as golf courses or retail greenhouses.

Posting must conform to all the following requirements. Treated areas shall be posted with signs at all usual points of entry and along likely routes of approach from the listed sensitive areas. When there are no usual points of entry, signs must be posted in the corners of the treated areas and in any other location affording maximum visibility to sensitive areas. The signs shall be printed in ENGLISH. Signs must be posted prior to application and must remain posted until foliage has dried and soil surface water has disappeared. Signs may remain in place indefinitely as long as they are composed of materials to prevent deterioration and maintain legibility for the duration of the posting period.

All words shall consist of letters at least 2 1/2 inches tall, and all letters and the symbol shall be a color, which sharply contrasts with their immediate background. At the top of the sign shall be the words "KEEP OUT", followed by an octagonal stop sign symbol at least 8 inches in diameter containing the word "STOP". Below the symbol shall be the words "PESTICIDE IN IRRIGATED WATER". Posting for chemigation does not replace other posting and reentry requirements for farm worker safety.

Operation

Start the water pump and sprinkler, and let the system achieve the desired pressure and speed before starting the injector. Start the injector and calibrate the injection system according to the directions above. This procedure is necessary to deliver the desired rate per acre in a uniform manner. Apply ROTAM METHOMYL 90SP in 0.1 to 0.2 inches of water per acre. When the application is finished, allow the entire irrigation and injector system to be thoroughly flushed clean before stopping the system. End guns must be turned off during the application, if they irrigate nontarget areas or if they do not provide uniform application and coverage.

It is recommended that nozzles in the immediate area of control panels, chemical supply tanks, wellheads and system safety devices be plugged to prevent contamination of these areas.

Do not apply when wind speed favors drift beyond the area intended for treatment.

Do not apply when system connections or fittings leak or when nozzles do not provide uniform distribution.

Cleaning the System

Thoroughly clean the injection system and tank of any fertilizer or chemical residues using a standard clean-out procedure. Dispose of any residues in accordance with State and Federal laws. Consult your owner's manual or your local equipment dealer for cleanout procedures for your injection system.

SPRAY DRIFT MANAGEMENT

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops. These requirements do not apply to forestry applications, public health uses or to

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applications using dry formulations.

1. The distance of the outer most nozzles on the boom must not exceed 3/4 the length of the wingspan or rotor.
2. Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

Where states have more stringent regulations, they should be observed. The applicator should be familiar with and take into account the information covered in the Aerial Drift Reduction Advisory Information

AERIAL DRIFT REDUCTION ADVISORY INFORMATION

Importance of Droplet Size

The most effective way to reduce drift potential is to apply large droplets (>150 - 200 microns). The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. The presence of sensitive species nearby, the environmental conditions, and pest pressure may affect how an applicator balances drift control and coverage. APPLYING LARGER DROPLETS REDUCES DRIFT POTENTIAL, BUT WILL NOT PREVENT DRIFT IF APPLICATIONS ARE MADE IMPROPERLY OR UNDER UNFAVORABLE ENVIRONMENTAL CONDITIONS! See **WIND, TEMPERATURE AND HUMIDITY**, and **TEMPERATURE INVERSIONS** sections of this label.

Controlling Droplet Size -- General Techniques

- **Volume** - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- **Pressure** - Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types lower pressure produces larger droplets. Use the lower spray pressures recommended for the nozzle. Higher pressure reduces droplet size and does not improve canopy penetration. WHEN HIGHER FLOW RATES ARE NEEDED, USE A HIGHER-CAPACITY NOZZLE INSTEAD OF INCREASING PRESSURE.
- **Nozzle Type** - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

Controlling Droplet Size -- Aircraft

- **Number of Nozzles** - Use the minimum number of nozzles that provide uniform coverage.
- **Nozzle Orientation** - Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
- **Nozzle Type** - Solid stream nozzles (such as disc and core with swirl plate removed) oriented straight back produce larger droplets than other nozzle types and the lowest drift.
- **Boom Length** - For some use patterns, reducing the effective boom length to less than 3/4 of the wingspan or rotor length may further reduce drift without reducing swath width.
- **Application Height** - Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.
- **Swath Adjustment** - When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downward edges

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of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.)

BOOM HEIGHT

Setting the boom at the lowest labeled height (if specified) which provides uniform coverage reduces the exposure of droplets to evaporation and wind. For ground equipment, the boom should remain level with the crop and have minimal bounce.

WIND

Drift potential is lowest between wind speeds of 3-10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 3 mph due to variable wind direction and high inversion potential. AVOID GUSTY OR WINDLESS CONDITIONS.

Note: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

TEMPERATURE AND HUMIDITY

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

TEMPERATURE INVERSIONS

Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain close to the ground and move laterally in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

SENSITIVE AREAS

The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from the sensitive areas).

SHIELDED SPRAYERS

Shielding the boom or individual nozzles can reduce the effects of wind. However, it is the responsibility of the applicator to verify that the shields are preventing drift and not interfering with uniform deposition of the product.

AIR ASSISTED (AIR BLAST) FIELD CROP SPRAYERS

Air assisted field crop sprayers carry droplets to the target via a downward directed air stream. Some may reduce the potential for drift, but if a sprayer is unsuitable for the application and/or set up improperly, high drift potential can

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result. It is the responsibility of the applicator to determine that a sprayer is suitable for the intended application, is configured properly, and that drift is not occurring.

Note: Air assisted field sprayers can affect product performance by affecting spray coverage and canopy penetration. Consult the application equipment section of this label to determine if use of an air assisted sprayer is recommended.

AIR ASSISTED (AIR BLAST) TREE AND VINE SPRAYERS

Air assisted tree and vine sprayers carry droplets into the canopy of trees and vines via a radially or laterally directed air stream. These sprayers are not suitable for applying herbicides. In addition to the general drift management principles already described, the following specific practices will further reduce the potential for drift:

- Adjust deflectors and aiming devices so that spray is only directed into the canopy.
- Block off upward pointed nozzles when there is no overhanging canopy.
- Use only enough air volume to penetrate the canopy and provide good coverage.
- Do not allow spray to go beyond the edge of the cultivated area. Spray the outside row only from outside the planting.

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CROP AND RATE CHARTS

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Alfalfa	Pea Aphid Lygus Bugs Blotch Leafminer Aphids Egyptian Alfalfa Weevil Larvae Loopers Beet Armyworm Armyworm Alfalfa Caterpillar Fall Armyworm Western Yellowstriped Armyworm Yellowstriped Armyworm	1/2 – 1	7 *	48 hrs
	Alfalfa Weevil Larvae	1		
	Variegated Cutworm	1/4 - 1		
	Do not apply to dormant or semi-dormant alfalfa when min. daily temp. is 50° F. or lower. Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. * Do not apply within 7 days of cutting or allowing livestock to graze.			
Anise (Fennel)	Cabbage Looper	1	7	48 hrs
	Beet Armyworm	1/2 - 1		
Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop				
Apple(Ground application only)	Apple Aphid Rosy Apple Aphid Tufted Apple Budmoth Green Fruitworm Tarnished Plant Bug	1/2 - 1 *	14	72 hrs
	Codling Moth (10-12 day spray intervals)			
	Leafrollers (Fruit-tree, Obliquebanded, Redbanded, Variegated) Lesser Appleworm White Apple Leafhopper Tentiform Leafminer Cutworm	1 *		
	Do not use on Early Macintosh & Wealthy varieties Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 5 applications per crop; minimum interval between treatments is 7 days. * Apply in a minimum of 50 gallons of water per acre.			

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Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Asparagus	Beet Armyworm, Western Yellowstriped Armyworm Asparagus Beetle Spotted Asparagus Beetle White Cutworm Redbacked Cutworm	1/2 - 1	1	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Avocado	Western Avocado Leafroller Omnivorous Looper	1/2 - 1	1	48 hrs
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Barley	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).			
Beans (Succulent) Including: Kidney, Lima, Mung, Navy, Pinto, Snap, Wax, Broad, Fave, Asparagus, Blackeyed peas Cowpeas, Chick peas, Garbanzo beans, Sweet lupine, White sweet lupine White lupine,	Leafhopper Mexican Bean Beetle	1/4 - 1	Succulent Beans 1/4 - 1/2 lb.- 1, over 1/2 lb. - 3; 3 Vines 7 Hay	48 hrs
	Fall Armyworm Variegated Cutworm	1/2		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Grain lupine	Corn Earworm Saltmarsh Caterpillar, Yellowstriped Armyworm Western Yellowstriped Armyworm, Lygus Bugs Thrips Aphids Loopers*	1/2 - 1		
	European Corn Borer (Ovicide & Larvicide)— Initiate when moth flights first appear and continue preventive treatments at 3-4 day intervals to control eggs and			
	Spotted Cucumber Beetle	1/4 - 1/2		
	Succulent Beans - Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. * Do not use for Loopers in AL & GA.			
Beans (Dry) (Follow Beans, Succulent)	(Follow Beans, Succulent)	(Follow Beans, Succulent)	14 - Dry Beans * 14 - Vines * 14 - Hay *	48 hrs
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting.			
Beets (Table)	Imported Cabbageworm	1/4 - 1	0 - roots 10 - tops	48 hrs
	Beet Armyworm Cabbage Looper Diamondback Moth	1/2 - 1		
	Cucumber Beetle Variegated Cutworm	1/2		
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Bermudagrass pasture	Fall Armyworm Armyworm Striped Grass Looper	1/4 - 1	7 - Forage * 3 - Dehydrated Hay **	48 hrs
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. * Do not apply within 7 days of feeding forage or allowing livestock to graze. ** Do not apply within 3 days of cutting for hay.			
Blueberries	Blueberry Leafhopper Aphids Tussock Moth Weevil Sharp-Nosed Leafhopper	1/2	3	48 hrs

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Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
	Cranberry Fruitworm*	1/2 - 1		
	Cherry Fruitworm*			
	Flea Beetle (larvae)	1		
	Sawfly (larvae)			
	Blueberry Leafroller			
	Blueberry Maggot	1/4 - 1/2		
Do not apply during bloom. Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than applications per crop. * For ground use only.				
Broccoli	Loopers, Diamondback Moth	1/2 - 1 **	3	48 hrs
	Imported Cabbageworm	1/4 - 1 **		
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. ** Add a wetting agent to improve coverage.			
Brussels Sprouts	Loopers Imported Cabbageworm, Diamondback Moth	1/2 - 1 **	3	48 hrs
	Variegated Cutworm	1/2 **		
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. ** Add a wetting agent to improve coverage			
Cabbage	Loopers * Diamondback Moth Fall Armyworm	1/2 - 1 **	1	48 hrs
	Imported Cabbageworm	1/4 - 1 **		
	Variegated Cutworm	1/2 **		
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 15 applications per crop; minimum interval between treatments is 2 days. * Do not use for Loopers in AL & GA. ** Add a wetting agent to improve coverage			
Carrot	Beet Armyworm Armyworms Aster Leafhopper	1/2 - 1	1	48 hrs
	Variegated Cutworm	1/4 - 1/2		
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Cauliflower	Imported Cabbageworm	1/4 - 1 **	3	48 hrs
	Loopers Diamondback Moth	1/2 - 1 **		
	Variegated Cutworm	1/2 **		
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. ** Add a wetting agent to improve coverage.			

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Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Celery	Beet Armyworm	1/2 - 1	7	48 hrs
	Aster Leafhopper			
	Loopers	1		
	Variegated Cutworm	1/2		
	Armyworms	1/4 - 1		
Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.				
Chicory	Beet Armyworm	1/2 - 1	80	48 hrs
	Variegated Cutworm Leafhoppers			
Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.				
Chinese Cabbage	Loopers	1/2 - 1*	10	48 hrs
	Beet Armyworm			
Do not apply more than 8 pounds of ROTAM METHOMYL 90SP/acre/crop. Do not make more than 10 applications/crop. * Minimum of 25 gallons water per acre by ground or 5 gallons by air.				
Collards (Fresh market only)	Diamondback Moth	1/2	10	48 hrs
	Variegated Cutworm			
	Imported Cabbageworm Beet Armyworm Loopers*	1/2 - 1		
Do not apply when temperature is less than 50° F. Do not apply when crop is less than 10" tall. Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop. * Do not use for Loopers in AL & GA.				
Corn (Field, Popcorn & Seed)	Earworm (Ovicide/Larvicide)	1/4 - 1/2	21- Ears 3 - Forage* 21 - Stover*	48 hrs
	Armyworm Fall Armyworm European Corn Borer- Ears 1-3 days or as needed Corn Rootworm (adult beetles) Flea Beetles Picnic Beetles Aphids			
	Variegated Cutworm, Beet Armyworm	1/2		
	Do not apply more than 2.5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. *Corn forage is green actively growing plants that are harvested with the ears intact, then plants can be fed directly to animals or used to make silage. Corn stover are the parts of the plant that remain after removal of the grain at full plant maturity. These remaining stalks and leaves can be fed as roughage to animals.			
Corn (Sweet)	Earworm-Whorl as needed	1/3 - 1/2	0 - Ears 3 - Forage 21- Stover	48 hrs
	Fall Armyworm Armyworm Earworm,- (Ovicide/Larvicide)	1/4 - 1/2		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
	European Corn Borer- Ears 1-3 days or as needed Corn Rootworm (adult beetles) Flea Beetles Picnic Beetles Aphids			
	Variegated Cutworm Beet Armyworm	1/2		
	Certain hybrid varieties of sweet corn are susceptible to methomyl injury. Treat a small area to determine crop safety before full scale spraying. Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 28 applications per crop; minimum interval between treatments is 1 day.			
Cotton All U.S.	Ovicide/Larvicide - Bollworm, Tobacco Budworm (Initiate schedule when significant numbers of eggs are present Continue at 3 to 5-day intervals while eggs are present and larval control is adequate. If significant larvae survive, use higher rates below.) Lygus Bugs/Plant Bugs (adults and nymphs) start treatment on low level population for suppression.	1/8 - 1/4 (see Insect Predator Section)	15	72 hrs
	Cotton Leafworm	1/4 - 1/2		
	Cotton Fleahopper (as needed)	1/8 - 1/4		
	Aphids, Thrips	1/4		
East of Rockies Only	(Early Season) Bollworm, Tobacco Budworm, Beet Armyworm, Cotton Leafhopper, Fall Armyworm, Lygus Bugs/Plant Bugs (adults and nymphs) Use as occasional spray in regular schedule but not more often than every 10 days.	1/2		
East of Rockies	(Late Season)	1/2 - 3/4	15	72 hrs

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Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Only	Bollworm, Tobacco Budworm, Beet Armyworm, Cotton Leafperforator, Fall Armyworm, Lygus Bugs/Plant Bugs (adult and nymphs). Up to 3 applications at 3-5 day intervals after desired boll load set on plants.			
Texas	Cotton Aphid	1/4 - 2/3		
West of Rockies only	Larvicide for worms Bollworm, Fall Armyworm, Tobacco Budworm, Lygus Bugs Beet Armyworm	1/2 - 3/4		
	Cotton Leafperforator	1/3 - 3/4		
	For applications West of the Rockies, make applications on 3-5 day intervals after desired boll load set on plants. For all cotton applications: Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop. Use may redden cotton. If excessive stop or alternate with other insecticides. Do not graze or feed.			
Cucumber	Loopers Tobacco Budworm Beet Armyworm, Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickeworm Fall Armyworm	1/2 - 1	1/2 lb. - 1 Over 1/2 lb.- 3	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 12 applications per crop.			
Eggplant	Green Peach Aphid	1/4 - 1	5	48 hrs
	Tomato Pinworm (Ground Application only) Beet Armyworm Corn Earworm	1/2 - 1		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Endive, Escarole	Beet Armyworm	1/2 - 1	10	48 hrs
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Garlic	Beet Armyworm	1/2 **	7	48 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop.			

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Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
	Do not make more than 6 applications per crop. ™ Add a wetting agent to improve coverage.			
Grapefruit CA, AZ & HI only	Thrips Fruitree Leafroller Orange Tortrix Western Tussock Moth Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Grapes East-of-Rockies only	Grape-Berry-Moth (apply pre- & post- bloom & repeat at 10-14 day intervals or as needed) Leafhoppers	1/2 - 1	1—Fresh & Raisin 14—Wine-Grapes	7 days
All-U.S.	Omnivorous Leafroller, Grape Leafroller Orange Tortrix			
West-of-Rockies only	Saltmarsh Caterpillar Leafhoppers ²			
	Climbing Cutworm (Treat infestation and repeat at 7-14 day intervals as needed)	1		
CA-only	Grape-Leaf Skeletonizer ²	1/2 - 1		
	Thrips	1/2 - 1		
	For all applications made to grapes in the United States: Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 6 applications per crop. ² Leafhoppers & Grape-Leaf Skeletonizer (Ground Application Only).			
Horseradish Ground application only	Aphids Thrips	1/2	65	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			

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Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application - Days To Harvest	REI	
Leafy Green Vegetables: Beet (tops) Dandelions, Kale, Mustard Greens, Parsley, Swiss Chard, Turnip Greens	Beet Armyworm Cabbage Looper* Diamondback Moth Imported Cabbageworm	1/2 - 1	10	48 hrs	
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop. * Do not use for Cabbage Loopers in AL & GA.				
Lemon CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix Beet Armyworm	1/2 - 1	1	72 hrs	
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.				
Lentils	Western Yellowstriped Armyworm	1/2 - 1	21	48 hrs	
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.				
Lettuce (Head and Leaf varieties)	Alfalfa Looper	1/4 - 1	1/4-1/2 lb. - 7 over 1/2 lb. - 10	48 hrs	
	Thrips Aphids Beet Armyworm Cabbage Looper Corn Earworm Aster Leafhopper	1/2 - 1			
	Variegated Cutworm	1/2			
	Lettuce (head varieties) Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 15 applications per crop; minimum interval between treatments is 2 days. Lettuce (leaf varieties) Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop; minimum interval between treatments is 2 days.				
Melons Including: Cantaloupe Casaba Santa Claus melon Crenshaw melon Honeydew melon Honey balls Persian melon Golden Pershaw melon Mango melon Pineapple melon Snake melon Watermelon	Loopers Tobacco Budworm Beet Armyworm Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickdeworm Fall Armyworm	1/2 - 1	1/2 lb. - 1 over 1/2 lb. - 3	48 hrs	
	Variegated Cutworm	1/2			
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 12 applications per crop.				

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Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application - Days To Harvest	REI
Mint (Peppermint, Spearmint)	Variegated Cutworm	1	14	48 hrs
	Alfalfa Looper			
	Flea Beetles	3/4 - 1		
Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.				
Nectarine CA & AZ only	Thrips	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 3 applications per crop.			
Oats	Armyworms	1/4 - 1/2	7	48 hrs
	Cereal Leaf Beetle*			
	Aphids**			
Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).				
Onions (Green & Dry Bulb)	Beet Armyworm	1/2 - 1 **	7 - Green and Dry Bulb Onions	48 hrs
	Thrips*	1 **		
	Variegated Cutworm			
	Black Cutworm			
Onions, green Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop; minimum interval between treatments is 5 days. Onions, dry bulb Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop; minimum treatment interval between treatments is 5 days. *Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation to control thrips. Begin applications before thrip populations reach 3-5 thrips per plant. For best results, add a wetting agent. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. ** Add a wetting agent to improve coverage.				

This page contains no comments

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Oranges CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix Fruitree Leafroller Beet Armyworm Citrus Cutworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Peaches	Catfacing Insects (Plant Bugs and Stink Bugs) - begin at petal fall and continue in cover sprays at 7-to 10-day intervals Oriental Fruit Moth* -begin at petal fall; use trapping devices and frequent field inspection to determine need for treatment. Continue treatment in cover sprays and alternate with residual-type insecticides registered for this use. Green Peach Aphid	1 lb (or 1/4 lb per 100 gal up to 400 gal per acre)	4	4 days
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 6 applications per crop. * Oriental Fruit Moth (Ground Application Only).			
Peanuts	Com Earworm* Potato Leafhopper Fall Armyworm	1/4 - 1	21	48 hrs
	Beet Armyworm	3/8 - 1		
	Green Cloverworm Velvetbean Caterpillar Cabbage Looper Soybean Looper ** Thrips Granulate Cutworm	1/2 - 1		
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 6 applications per crop. * ROTAM METHOMYL 90SP has ovicidal and larvicidal control on com earworm. **Soybean Looper is difficult to control. Do not apply to worms greater than 1 per 2" long. Use higher rate for severe infestations. Do not feed treated vines.			

This page contains no comments

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application - Days To Harvest	REI	
Pears Northeast only	Green Fruitworm Oblique banded Leafroller	1/2 - 1 *	7	48 hrs	
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop. * Apply in a minimum of 50 gallons of water per acre.				
Peas (succulent) Including: Pigeon peas Chick peas Garbanzo beans Dwarf peas Garden peas Green peas English Peas Field peas Edible pod peas	Alfalfa Looper Cabbage Looper*	1/2 - 1	1 - Peas 5 - Forage 14 - Hay	48 hrs	
	Pea Aphid Beet Armyworm Saltmarsh Caterpillar Variegated Cutworm				
	Alfalfa Caterpillar Armyworm Green Cloverworm	1/4 - 1			
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 6 applications per crop; minimum interval between treatments is 3 days. * Do not use for Cabbage Loopers in AL & GA.				
Pecans Southeast only	Aphids	1/2 - 1	30	48 hrs	
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP/acre/crop. Do not make more than 7 applications per crop.				
Peppers Including: Bell Hot Pimentos Sweet	Loopers Beet Armyworm Green Peach Aphid Armyworm Fall Armyworm	1/2 - 1	3	48 hrs	
	Variegated Cutworm	1/4 - 1/2			
	European Corn Borer	1			
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.				
	Omnivorous Leafroller	1	14		
Pomegranates	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			48 hrs	
Potato	Tuberworm* Loopers Aphids Beet Armyworm Leafhoppers Fall Armyworm	1/2 - 1	6	48 hrs	
	Variegated Cutworm Flea Beetles	1/2			
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.				

This page contains no comments

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Potato (cont.)	Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section. *Repeat applications of ROTAM METHOMYL 90SP on a 5-7 day schedule, or longer as needed, to control tuber worm populations. An application schedule of effective insecticides with different modes of action may be needed to keep foliar feeding larval populations as low as possible prior to harvest to reduce the risk of larval damage to the tubers. Failure to adequately control tuberworm larvae prior to crop senescence or vine kill increases the risk of tuber damage.			
Rye	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).			
Sorghum Including: Sudangrass (Except Sweet Sorghum)	Sorghum Webworm	1/2 *	14 **	48 hrs
	Sorghum Midge —Apply when 50% bloom and 3-5 days later if needed. Fall Armyworm (Budworm) Beet Armyworm Corn Earworm Armyworm	1/4 - 1/2 *		
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop. * Minimum of 10 gallons per acre by ground or 2 gallons per acre by air. ** Do not apply within 14 days of feeding forage or cutting for hay.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Soybeans	Green Cloverworm Velvetbean Caterpillar Mexican Bean Beetle Corn Earworm Light to Moderate infestations	1/8 - 1/4 (see Insect Predator section)	14 - Soybeans 3 - Forage 12 - Hay	48 hrs
	Moderate to severe infestations	1/4 - 1/2		
	Soybean Aphid	1/6 - 1/3		
	Beet Armyworm Salt Marsh Caterpillar Bean Leaf Beetle Fall Armyworm Thrips Silver Spotted Skipper Light to Moderate infestations	1/4 - 3/8		
	Moderate to severe infestations	3/8 - 1/2		
	Do not apply more than 1.5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 3 applications per crop.			
Spinach	Alfalfa Loopers Cabbage Looper Beet Armyworm Fall Armyworm	1/2 - 1	7	48 hrs
	Variegated Cutworm	1/2		
	Do not apply when minimum daily temperature is 32° F. or lower. Do not apply to seedlings less than 3" diameter. Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Sugar Beet	Beet Webworm Flea Beetles Carrion Beetles Beet Armyworm* Aphide* Western Yellowstriped Armyworm*	1/4 - 1	30 -Tops 21 - Roots	48 hrs
	Variegated Cutworm	1/2		

This page contains no comments

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Sugar Beet (cont.)	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. *Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation to control beet armyworm, aphids and western yellowstriped armyworm. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information.			
Summer Squash* Including: Crookneck squash Straightneck squash Scalloped squash Vegetable marrow Spaghetti squash Hyotan Cucuzza Hechima Chinese okra Bitter melon Balsam pear Balsam apple Chinese Cucumber	Loopers Tobacco Budworm Beet Armyworm Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickeworm Fall Armyworm	1/2 - 1	1/2 lb. -- 1 day over 1/2 lb.-- 3 days	48 hrs
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 12 applications per crop. *Fruit of the Gourd (Cucurbitaceae) family that are consumed when immature, 100% of the fruit is edible cooked or raw, once picked cannot be stored, has a soft rind which is easily penetrated, and if seeds were harvested they would not germinate.			
Tangelo, Tangerine CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix, Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Tobacco (Except shade)	Flea Beetle Hornworm	1/4 - 1/2	5 - Flue cured 14 - Air or fire cured	48 hrs
	Loopers Aphids Tobacco Budworm Fall Armyworm	1/2		
	Do not apply more than 2.5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 5 applications per crop.			

This page contains no comments

This page contains no comments

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Tomato (Including Tomatillos*)	Tomato Fruitworm Aphids Hornworm Loopers Beet Armyworm Southern Armyworm Pinworm Armyworm Fall Armyworm	1/2 - 1	1	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 16 applications per crop. * For tomatillos do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop . Do not make more than 5 applications per crop.			
Turf (For use on sod farms only)	Sod Webworm (after application, sprinkle irrigate for 15 minutes)	1 (2/5 ozs. per 1000 sq. ft.)		48 hrs
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Do not graze or feed.			
Wheat	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications to a on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).			

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

Pesticide Storage: Store in a tightly closed container in a cool, dry place.

Prohibitions: Do not reuse empty container.

Pesticide Disposal: Pesticide spray mixture or rinseate that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticides. Improper disposal of excess pesticide spray mixture or rinseate is a violation of Federal law. If these wastes cannot be disposed of by the use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal: For Water Soluble Packets: Do not reuse the outer box or the resealable plastic bag. When all water soluble packets are used, the outer packaging should be clean and may be disposed of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by open burning. If burned, stay out of smoke. If the resealable plastic bag contacts the formulated product in any way, the bag must be triple rinsed with clean water. Add the rinseate to the spray tank and dispose of the outer wrap as described above.

For Paper and Plastic Bags: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

SPILLS: For minor spills, leaks, etc., follow all precautions indicated on this label and clean up immediately. Take special care to avoid contamination of equipment and facilities during cleanup procedures and disposal of wastes.

In the event of a major spill, fire or other emergency, call CHEMTREC, day or night, 1-800-424-9300.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Rotam Agrochemical Company Limited or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Rotam Agrochemical Company Limited and Seller harmless for any claims relating to such factors.

Rotam Agrochemical Company Limited warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Rotam Agrochemical Company Limited, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW ROTAM LTD MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the extent consistent with applicable law, Rotam Agrochemical Company Limited or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ROTAM AGROCHEMICAL COMPANY LIMITED AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ROTAM AGROCHEMICAL COMPANY LIMITED OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Rotam Agrochemical Company Limited and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of Rotam Agrochemical Company Limited.

Manufactured by:
Rotam Agrochemical Company Ltd.
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong
1-866-927-6826

Registered: [TBA]

This page contains no comments

[Back Page of Booklet - remains on the container when booklet is removed]

RESTRICTED USE PESTICIDE

Due to high Acute Toxicity to Humans

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

GROUP 1A INSECTICIDE

Rotam Methomyl 90SP Insecticide In Water Soluble Packets

Active Ingredient	
Methomyl	
(S-methyl-N-[(methylcarbamoyl)oxy]thioacetimidate)	
	90%
Inert Ingredients	10%
TOTAL	100%

EPA Reg. No. 83100 - TBA

EPA Est. No.: TBA

KEEP OUT OF REACH OF CHILDREN
DANGER POISON



PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See additional Precautionary Statements on inside booklet and back panel of container and Directions For Use on inside booklet.

Page: 35

Author: thar02 Subject: Replacement Text
replace with "Other Ingredients"

Date: 4/1/2011 2:16:26 PM

FIRST AID**(N-Methyl Carbamate insecticide)**

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

ATROPINE IS AN ANTIDOTE. SEEK MEDICAL ATTENTION AT ONCE IN ALL CASES OF SUSPECTED POISONING.

If poisoning symptoms appear (see POISONING SYMPTOMS), get medical attention.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS
AND DOMESTIC ANIMALS**

DANGER. FATAL IF SWALLOWED. MAY BE FATAL IF INHALED OR GETS IN EYES. DO NOT BREATHE DUST OR SPRAY MIST.

Do not get in eyes or on clothing. Wear protective eyewear and respirator. Harmful if absorbed through skin. Avoid contact with skin. Wash hands thoroughly with soap and water after handling.

POISONING SYMPTOMS: Methomyl poisoning produces effects associated with anticholinesterase activity which may include weakness, blurred vision, headache, nausea, abdominal cramps, discomfort in the chest, constriction of pupils, sweating, slow pulse, muscle tremors. If poisoning symptoms appear, refer to First Aid section on the ROTAM METHOMYL 90SP label and seek medical attention at once.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

TREATMENT: Atropine sulfate should be used for treatment. Administer repeated doses, 1.2 to 2.0 mg, intravenously every 10 to 30 minutes until full atropinization is achieved. Maintain atropinization until the patient recovers. Artificial respiration or oxygen may be necessary. Allow no further exposure to any cholinesterase inhibitor until recovery is assured.

Do not use 2-PAM for exposure to ROTAM METHOMYL 90SP alone. However, for exposure to combinations of ROTAM METHOMYL 90SP and

organophosphorous insecticides, 2-PAM may be used as required to supplement the atropine sulfate treatment. Do not use morphine.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, and mammals. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high-water mark. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area. This chemical is known to leach through soil into groundwater under certain conditions as a result of label use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

This chemical can contaminate surface water through spray drift. Under some conditions, it may also have a high potential for runoff into surface water for several days to weeks after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, and areas overlaying extremely shallow groundwater, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas over-laying tile drainage systems that drain to surface water.

PHYSICAL AND CHEMICAL HAZARDS

Keep container closed. Use with adequate ventilation.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

Storage: Store in a tightly closed container in a cool, dry place.

Prohibitions: Do not reuse empty container.

Pesticide Disposal: Pesticide spray mixture or rinsate that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticides. Improper disposal of excess pesticide spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by the user according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal: For Water Soluble Packets: Do not reuse the outer box or the resealable plastic bag. When all water-soluble packets are used, the outer packaging should be clean and may be disposed of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by open burning. If burned, stay out of smoke. If the resealable plastic bag contains the formulated product in any way, the bag must be triple-rinsed with clean water. Add the rinsate to the spray tank and dispose of the outer wrap as described above.

For Paper and Plastic Bags: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

SPILLS: For minor spills, leaks, etc., follow all precautions indicated on this label and clean up immediately. Take special care to avoid contamination of equipment and facilities during cleanup procedures and disposal of wastes. In the event of a major spill, fire or other emergency, call CHEMTREC, day or night, 1-800-424-9300.

Page: 37

Author: thar02 Subject: Replacement Text Date: 4/1/2011 2:20:29 PM
rewrite using 352-242 and PR Notice as models

This page contains no comments

Manufactured by:
Rotam Agrochemical Company Ltd.
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong
1-866-927-6826

Net Contents:
Packets/Container

Registered:



reviews so far for methomyl products

Thomas Harris t
o Frank Sobotka
:

03/24/2011 12:20 PM

Dr. Sobotka,

Here are the reviews so far for the pending methomyl products listed below. The product chemistry for the two end-use products are still in process.

>>> ACTION ITEMS:

81598-O

LABEL - Change % a.i., inert to other, change % other.

83100-ET

LABEL - revise signal word, methanol text, Precautionary text intro, PPE

83100-EI

LABEL - should be ok but check against acute tox review to be sure

TECHNICAL 81598-O



81598-O.product chemistry.20110228.no CBI.pdf



81598-00009.acute tox review.20110223.pdf

29LV 83100-ET



83100-00027.acute tox review.20110228.pdf

90SP 83100-EI



83100-00028.acute tox review.20110310.pdf

Tom Harris
EPA/OCSP/OPP/RD/IRB
voice: (703) 308-9423
fax: (703) 308-0029
harris.thomas@epa.gov
visit <http://www.epa.gov/pesticides>



RE: need 83100-ET color info

Frank Sobotka o Thomas Harris

03/16/2011 01:20 PM

History: This message has been replied to.

See attached revised CSF for 83100-ET and 83100-EI (page 1&2). Both CSF's have been corrected to
> Rock/DC/USEPA/US]



> 83100-EI Alt Methomyl 90SP CSF p1&2 rev 03_16_11.pdf 83100-ET Alt Methomyl 29LV CSF rev 03_16_11.pdf

CBI
removed

see CSF folder

Memorandum

Date: 3/21/11

To: PM 7, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a:

- ☒ **fully accepted submission**
- ☐ partially accepted submission
- ☐ rejected submission



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 15, 2011

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

FRANK E. SOBOTKA, PH.D.
IPM RESOURCES LLC
ROTAM AGROCHEMICAL COMPANY LIMITED
7/F CHEUNG TAT CENTRE
4032 CROCKERS LAKE BLVD., STE 818
SARASOTA, FL 43238-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 14-MAR-11. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Receipt for Section 3

S: 891954

Resubmission: ☒ Yes ☐ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: New Registration

Billable: ☐ Yes ☒ No

Company: 83100 ROTAM AGROCHEMICAL COMPANY LIMITED

V

Risk Manager: Registration Division, Risk Management Team 7

Product #: 83100-EI

Product Name: ROTAM METHOMYL 90SP INSECTICIDE

Override#:

Me Too

Section3: 352-342

Me Too

Product Name: DUPONT LANNATE SP INSECTICIDE

Application Date: 10-Mar-2011

ie

OPP Rec'd Date: 14-Mar-2011

ie

Front End Date: 14-Mar-2011

ie

Risk Manager Send Date: 14-Mar-2011

ie

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

revised volume 1-R (group A product chemistry)

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Des

Study

View/Edit

IPM Resources LLC

4032 Crockers Lake Blvd., Suite 818, Sarasota, FL 34238 Phone: (215) 497-9501 Fax: (215) 497-9502

484168-00

"an intellectual property management resource company"

March 10, 2010

VIA UPS EXPRESS NDA

Harris.Tom@epa.gov

[REF. ☎ 1 -703-308-9423]

Document Processing Desk
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501
ATTN: John Hebert PM 7/Tom Harris

SUBJECT: Application for Registration - Rotam Methomyl 90SP Insecticide
Submission of Revised Volume 1-R (Group A Product Chemistry)
EPA File Symbol 83100 - EI

Dear Mr. Harris :

The purpose of this letter is to transmit to the Agency on behalf of Rotam Agrochemical Company Limited a Revised Copy of MRID 48226101 (Volume 1-R/Product Chemistry Group A) for the above subject Product Submission in review. Rotam is requesting that a new MRID number be issued for this report, and, the report added to MRID 48226191 as a Revised Updated Report for the subject product Chemistry data requirements.

This Report adds revisions to the Basic Confidential Statement of Formula requested by Shyam Mathur, Product Chemistry Reviewer, and, adds a second Confidential Statement of Formula (Alternate CSF) with supporting information on the Products Identity and Disclosure of Ingredients, including Manufacturing Process, for an Alternative Formulation containing a colorant. The specified Colorant (inert dye) is a Food Grade Colorant approved for direct application and packaging of food products.

The addition of a colorant incorporates better stewardship of the product by allowing the end-user to identify the presence of the product in the tank when mixing and applying the product.

Rotam trusts that the Agency will give this use special consideration when evaluating the products "significant similarity" in composition with respect to FIFRA Section 3(c)(3)(b)(i). The following documents are enclosed with this submission:

John Hebert, PM 7/Tom Harris
EPA Registrations Branch
March 10, 2011

Page 2

SUBJECT: Application for Registration - Rotam Methomyl 90SP Insecticide/Continued Submission of Vol 1-R (REVISED) EPA File Symbol 83100 - EI

Administrative Materials: (MRID No.: _____)

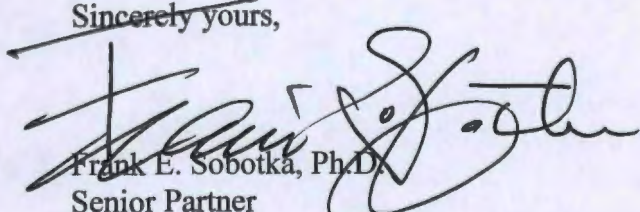
- Transmittal Form (EPA Form 8570-1)

Three copies each of the following:

VOLUME NO.	DESCRIPTION	OPPTS GUIDELINE REF. NO.	MRID NO.
1-R (REVISED)	Product Identity & Disclosure of Ingredients, Including Manufacturing Process/Rotam Methomyl 90SP Insecticide [Report No.: METHMYL90SP]	Group A 830.1550 830.1600 830.1650	48416801

We appreciate your assistance with this Application. If you have any questions or need additional information, please do not hesitate to contact us at any time.

Sincerely yours,


Frank E. Sobotka, Ph.D.
Senior Partner
IPM Resources LLC (Agent)

ATT:



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Rotam Agrochemical Company Ltd / 83100	2. EPA Product Manager John Hebert/Tom Harris	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) Rotam Methomyl 90SP Insecticide (83100-EI)	PM# 7	
5. Name and Address of Applicant (Include ZIP Code) ROTAM Agrochemical Company Limited C/O IPM Resources LLC (Agent) 4032 Crockers Lake Blvd., Suite 818 Sarasota, FL 34238 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 352-342 Product Name DuPont Lannate SP	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of Revised Volume 1-R (Previously issued MRID# 48226101) Product Chemistry Group A for Rotam Methomyl 90SP Insecticide (83100-EI) per request of Tom Harris. This revised Report adds an Alternate Confidential Statement of Formula (CSF), adding use of a Food Use Colorant, in addition to the Basic CSF. This submission also includes an updated Basic CSF for Methomyl 90SP with corrections to account for the changes in Nominal concentration of the cited Technical Active ingredient (81598-O).

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt. 24/12/10 lb bag	No. per container 24/6/4 /case	If "Yes" Package wgt 0.5/2/5 lbs/bag	No. per container 1/1/2 /bag
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product Printed or glued <input checked="" type="checkbox"/>		<input checked="" type="checkbox"/> Lithograph Paper glued Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Frank E. Sobotka, Ph.D.		Title Agent	
		Telephone No. (Include Area Code) 215 497-9501	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			8. Date Application Received (Stamped)
2. Signature 		3. Title Agent	
4. Typed Name Frank E. Sobotka, Ph.D.		5. Date March 07, 2011	



Electronic versions of the labels for 83100-ET, 83100-EI and 81598-O

Frank Sobotka t
o Thomas Harris
:

03/09/2011 10:43 AM

See Attached documents per our phone conversation.

Dr. Frank E. Sobotka, Senior Partner
IPM Resources LLC
4032 Crockers Lake Blvd.
Suite 818
Sarasota, FL 34238
PH: 215 497-9501
FX: 215 497-9502



083100-000ET.20110308.29LV Primary.pdf



083100-000EI.20110308.90SP Primary.pdf



081598-0000.20110308.Tech Primary.pdf

RESTRICTED USE PESTICIDE

Due to High Acute Toxicity to Humans

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

GROUP

1A

INSECTICIDE

Rotam Methomyl 90SP Insecticide *In Water Soluble Packets*

Active Ingredient

Methomyl

(S-methyl-N-[(methylcarbamoyl)
oxy]thioacetimidate)

90%

Inert Ingredients

10%

TOTAL

100%

EPA Reg. No. 83100 - TBA

EPA Est. No.: TBA

**KEEP OUT OF REACH OF CHILDREN
DANGER POISON**



PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See additional Precautionary Statements on inside booklet and back panel of container and Directions for Use on inside booklet.

Manufactured by:
Rotam Agrochemical Company Ltd.
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong
1-866-927-6826

**Net Contents:
Packets/Container**

RESTRICTED USE PESTICIDE

Due to High Acute Toxicity to Humans

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

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Rotam Methomyl 90SP Insecticide *In Water Soluble Packets*

KEEP OUT OF REACH OF CHILDREN
DANGER POISON



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Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID

(N-Methyl Carbamate insecticide)

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

ATROPINE IS AN ANTIDOTE. SEEK MEDICAL ATTENTION AT ONCE IN ALL CASES OF SUSPECTED POISONING.

If poisoning symptoms appear (see POISONING SYMPTOMS), get medical attention. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. FATAL IF SWALLOWED. MAY BE FATAL IF INHALED OR GETS IN EYES. DO NOT BREATHE DUST OR SPRAY MIST.

Do not get in eyes or on clothing. Wear protective eyewear and respirator.

Harmful if absorbed through skin. Avoid contact with skin. Wash hands thoroughly with soap and water after handling.

POISONING SYMPTOMS: Methomyl poisoning produces effects associated with anticholinesterase activity which may include weakness, blurred vision, headache, nausea, abdominal cramps, discomfort in the chest, constriction of pupils, sweating, slow pulse, muscle tremors. If poisoning symptoms appear, refer to First Aid section on the ROTAM METHOMYL 90SP label and seek medical attention at once.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

TREATMENT: Atropine sulfate should be used for treatment. Administer repeated doses, 1.2 to 2.0 mg. intravenously every 10 to 30 minutes until full atropinization is achieved. Maintain atropinization until the patient recovers. Artificial respiration or oxygen may be necessary. Allow no further exposure to any cholinesterase inhibitor until recovery is assured.

Do not use 2-PAM for exposure to ROTAM METHOMYL 90SP alone. However, for exposure to combinations of ROTAM METHOMYL 90SP and organophosphorous insecticides, 2-PAM may be used as required to supplement the atropine sulfate treatment. Do not use morphine.

Refer to inside label booklet for additional precautionary information including Personal Protective Equipment (PPE), User Safety Recommendations, Engineering Controls Statements, Environmental Hazards and Directions For Use.

Water Soluble Powder In Water Soluble Bags

Active Ingredient

Methomyl

(S-methyl-N-[(methylcarbamoyl)
oxy]thioacetimidate) 90%

Inert Ingredients 10%

TOTAL 100%

EPA Reg. No. 83100 - TBA

EPA Est. No.: TBA

Manufactured by:
Rotam Agrochemical Company Ltd.
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong
1-866-927-6826

Net Contents:
Packets/Container

Table of Contents	Page
Precautionary Statements	
Directions For Use	
Agricultural Use Requirements	
General Information	
Scouting	
Insect Predators	
Resistance	
Compatibility	
Integrated Pest Management	
Spray Preparation	
Application	
Spray Drift Management	
Crop and Rate Tables	
Storage and Disposal	
Notice of Warranty	

✓ optional
put at start of DFC
add crops

PRECAUTIONARY STATEMENTS (Continued)
HAZARDS TO HUMAN AND DOMESTIC ANIMALS

~~DANGER~~

PERSONAL PROTECTIVE EQUIPMENT

Applicators and others exposed to the diluted spray solution must wear:

- Long-sleeved shirt and long pants.
- Chemical resistant gloves such as barrier laminate or butyl rubber.
- Shoes plus socks.
- Protective eyewear.

Mixers, loaders, cleaners, repairers of application equipment, and others exposed to the concentrate must wear:

- Long sleeve shirt and long pants.
- Chemical-resistant gloves, such as barrier laminate or butyl rubber.
- Socks and chemical resistant footwear.
- Protective eyewear.
- Respirator as outlined below.
- Chemical resistant apron.

For exposures in enclosed areas, a respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or a canister with any R, P, or HE prefilter.

For exposures outdoors, Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any R, P, or HE prefilter. Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROL STATEMENTS

Human flaggers must be in enclosed cabs.

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR part 170.240 (d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

The enclosed cabs must be used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR part 170.240 (d)(4-6)]. The handler PPE requirements may be reduced or modified as specified in the WPS.

Water soluble packets when used correctly qualify as a closed loading system under the WPS. Handlers handling this product while it is enclosed in intact water-soluble packets are permitted to wear long-sleeved shirt, long pants, shoes plus socks, chemical-resistant gloves, and chemical-resistant apron, provided the other required PPE is immediately available in case the bag is opened.

Pilots must not assist in the mixing and loading operations.

USER SAFETY RECOMMENDATIONS

Users Should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove personal protective equipment immediately after handling this product.
- Wash the outside of gloves before removing.
- As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, and mammals. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high-water mark. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area. This chemical is known to leach through soil into groundwater under certain conditions as a result of label use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

This chemical can contaminate surface water through spray drift. Under some conditions, it may also have a high potential for runoff into surface water for several days to weeks after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, and areas overlaying extremely shallow groundwater, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas over-laying tile drainage systems that drain to surface water.

PHYSICAL AND CHEMICAL HAZARDS

Keep container closed. Use with adequate ventilation.

DIRECTIONS FOR USE

Restricted Use Pesticide

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

*must
TOC
none
if used* →

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI). REI Summary: ~~REI grapes = 7 day~~; REI peaches = 4 day; REI apple, cotton, grapefruit, lemon, nectarine, orange, tangelo, tangerine = 3 day; all other WPS uses = 48 hour REI.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical Resistant Gloves Category A (such as butyl rubber, natural rubber, neoprene rubber or nitrile rubber), all >14 mils
- Shoes plus socks
- Protective eyewear

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

~~Notify workers of the application to grapes by warning them orally and by posting warning signs at entrances to treated areas.~~

APPLICATION GENERAL INFORMATION

to chem
Chemigation: Overhead sprinkler chemigation is allowed for use in alfalfa, barley, oats, onions, potatoes, rye, sugar beets, and wheat. Refer to supplemental, or Special Local Need (SLN) labeling or the crop specific sections of this label for use directions for chemigation. Do not apply this product through any other type of irrigation systems, except those allowed by instructions provided in a supplemental, SLN or this product label.

Do not formulate this product into other End-use products without written permission from Rotam.

ROTAM METHOMYL 90SP insecticide should be used only in accordance with directions for use on this label or in separate Rotam supplemental labeling. Rotam will not be responsible for use of the product in a manner not specified by Rotam in the product's labeling and User assumes all risk for such use.

ROTAM METHOMYL 90SP is a dry powder to be dissolved in water for application by mechanical ground, overhead sprinkler, or aerial application. Hand-held equipment is prohibited for application to crops.

Do not apply by ground equipment within 25 feet, or by air within 100 feet of lakes, reservoirs, rivers, estuaries, commercial fish ponds and natural, permanent streams, marshes or natural, permanent ponds. Increase the buffer zone to 450 feet from the above aquatic areas when ultra low volume application is made.

Pilots must not assist in the mixing and loading operations.

Use only in commercial and farm plantings. Not for use in home plantings. Not for use during any period after a commercial crop site is opened for public entry as a "U-Pick", "Pick Your Own" or similar operation; in no case shall preharvest applications be made after first public entry. The restricted entry interval and preharvest interval for the crop stated elsewhere on this label must be followed.

SCOUTING

Monitor insect populations to determine whether or not there is a need for application of ROTAM METHOMYL 90SP based on locally determined economic thresholds. More than one treatment of ROTAM METHOMYL 90SP may be required to control a population of pests.

BENEFICIAL ANTHROPODS

ROTAM METHOMYL 90SP at rates of 1/8 to 1/4 lb. per acre helps conserve certain beneficials, including big-eyed bugs, damsel bugs, flower bugs and spiders in cotton and soybeans. While these beneficials cannot be relied upon to control pests, they are of potential value and should be monitored along with pests in pest management programs on these crops.

RESISTANCE MANAGEMENT

For resistance management, ROTAM METHOMYL 90SP insecticide is a group 1A insecticide. Repeated and exclusive use of ROTAM METHOMYL 90SP or other group 1A insecticides may lead to the build-up of resistant strains of insects in some crops. Not all members of this group have been shown to be cross-resistant. Different resistance mechanisms that are not linked to target site of action, such as enhanced metabolism, are common for this group of chemicals. Alternation of compounds from different sub-groups within this group may be an acceptable part of an integrated pest management program.

Some insects are known to develop resistance to products used repeatedly for control. When this occurs, the recommended dosages fail to suppress the pest population below the economic threshold. Because the development of resistance cannot be predicted, the use of this product should conform to resistance management strategies established for the use area. These strategies may include incorporation of cultural and biological control practices, alternation of active classes of insecticides on succeeding generations and targeting the most susceptible life stage. Consult your local or state agricultural authorities for details.

If resistance to this product develops in your area, this product, or other products with a similar mode of action, may not provide adequate control. If poor performance cannot be attributed to improper application or extreme weather conditions, a resistant strain of insect may be present. If you experience difficulty with control and resistance is a reasonable cause, immediately consult your local company representative or agricultural advisor for the best alternative method of control for your area. For additional information on insect resistance monitoring, visit the Insecticide Resistance Action Committee (IRAC) on the web at <http://www.irac-online.org>.

INTEGRATED PEST MANAGEMENT

This product should be used as part of an Integrated Pest Management (IPM) program which can include biological, cultural, and genetic practices aimed at preventing economic pest damage. Application of this product should be based on IPM principles and practices including field scouting or other detection methods, correct target pest identification, population monitoring, and treating

when target pest populations reach locally determined action thresholds. Consult your state cooperative extension service, professional consultants or other qualified authorities to determine appropriate action treatment threshold levels for treating specific pest/crop systems in your area.

*move
scout
sufficiently
here* →

SPRAY PREPARATION

Spray equipment must be clean and free of previous pesticide deposits before applying ROTAM METHOMYL 90SP.

Fill spray tank 1/4 to 1/2 full of water. Add ROTAM METHOMYL 90SP directly to spray tank. Carefully open the outer barrier bag containing ROTAM METHOMYL 90SP in a water soluble bag. Do not cut open the outer barrier bag. Invert the outer barrier bag allowing the inner water soluble bag to fall directly into the spray tank. Do not allow packets to become wet prior to adding to the spray tank. Do not handle, open, rip, tear, cut or perforate the inner water soluble bag. Mix thoroughly to fully dissolve the insecticide; once dissolved continued agitation is not required. Use mechanical or hydraulic means; do not use air agitation. Be sure the soluble packet is completely dissolved before adding any other ingredients. Spray mix should not be stored overnight in spray tank.

Compatibility: Since formulations may be changed and new ones introduced, it is recommended that users premix a small quantity of a desired tank mix and observe for possible adverse changes (settling out, flocculation, etc.). Avoid mixtures of several materials and very concentrated spray mixtures.

Do not use ROTAM METHOMYL 90SP with Bordeaux mixture (copper sulfate and hydrated lime), Du Ter triphenyltin hydroxide, lime sulfur, Rayplex iron or in highly alkaline solutions. Use mildly alkaline mixtures immediately after mixing to prevent loss of insecticidal activity.

Tank-mix solutions containing Boron may affect solubility of the water soluble film. When using Boron containing solutions in a tank-mix, follow these procedures:

- Add the correct amount of ROTAM METHOMYL 90SP water soluble packets first
- Be sure the soluble packets are completely dissolved
- Introduce Boron containing solutions last

If the above procedure cannot be followed, and Boron is an essential part of the spray mix, substitute ROTAM METHOMYL LV formulation for the water soluble packets.

Tank Mix Sequence: Add different formulation types in the sequence indicated below. Allow time for complete mixing and dispersion after addition of each product.

1. ROTAM METHOMYL 90SP and other products in water soluble bags.
2. Water dispersible granules
3. Wettable powders
4. Water based suspension concentrates
5. Water soluble concentrates
6. Oil based suspension concentrates
7. Emulsifiable concentrates
8. Adjuvants, surfactants, oils
9. Soluble fertilizers
10. Drift retardants

Follow local practice and manufacturer's recommendation.

APPLICATION

Apply at the recommended rates when insect populations reach locally determined economic thresholds. Consult the cooperative extension service, professional consultants or other qualified authorities to determine appropriate threshold levels for treatment in your area.

Follow-up treatments of ROTAM METHOMYL 90SP should be applied, as needed, to keep pest populations within threshold limits. On most crops, ROTAM METHOMYL 90SP should be applied at 5 to 7 day intervals to maintain control. Refer to crop specific directions for use in the crop tables for more specific information on treatment intervals.

Use sufficient water to obtain thorough, uniform coverage. Since ROTAM METHOMYL 90SP is a fast acting contact insecticide, best results follow direct spraying of the target insect.

For aerial, use a minimum of 2 gals. per acre (gpa) except 10 gpa for grapes, peaches, and nectarines; 15 gpa for oranges, lemons, grapefruit, tangelos and tangerines.

For certain crops a minimum of 1 gallon per acre may be used providing the following conditions are met:

- equipment is adjusted to distribute spray uniformly over the spray swath,
- wind conditions and other factors such as temperature and humidity are such that the spray is delivered to the target area,
- local regulations do not prohibit low-volume aerial sprays,
- use rates are applied as directed on the package label or supplemental labeling for the following crops:

Alfalfa	Celery	Peas (succulent)
Anise	Collards	Peppermint
Asparagus	Corn	Peppers
Barley	Cotton	Potato
Beans	Cucumber	Rye
Broccoli	Lettuce	Soybean
Brussels sprouts		Melons Spinach
Cabbage	Mint	Sugar beet
Carrot	Oats	Summer Squash
Cauliflower	Peanuts	Wheat

Apply the low rates on small plants, small insects and light infestations of insects. Use intermediate rates on large insects and heavier infestations of insects. Use 1 to 3 applications of the highest recommended rate for controlling severe infestations. Thereafter, use the lowest rate possible to maintain control.

SPRAY TANK CLEANOUT

Immediately following application, thoroughly clean all spray equipment to reduce the risk of forming hardened deposits which might become difficult to remove.

Drain spray equipment. Thoroughly rinse sprayer and flush hoses, boom and nozzles with clean water.

Clean all other associated application equipment. Take all necessary safety precautions when cleaning equipment. Do not clean near wells, water sources or desirable vegetation. Dispose of waste rinse water in accordance with local regulations.

CHEMIGATION

Instructions for the Use of ROTAM METHOMYL 90SP on Alfalfa, Barley, Oats, Green and Dry Bulb Onions, Potatoes, Rye, Sugar Beets and Wheat

Using Overhead Sprinkler Chemigation

Overhead chemigation applications offer the advantage of greater penetration and coverage of the target plant. However, typical chemigation applications are more dilute than ground or aerial applications. For best results, it is recommended to keep the concentration of ROTAM METHOMYL 90SP as high as possible in the application. Apply ROTAM METHOMYL 90SP in 0.1 to 0.2 inches of water per acre. ROTAM METHOMYL 90SP is most active as a contact insecticide, although it does also have activity via ingestion of treated plants. For best results, applications of ROTAM METHOMYL 90SP should take place when the insects are active and most likely to come into direct contact with the application.

Types of Irrigation Systems

ROTAM METHOMYL 90SP may be applied through overhead sprinkler irrigation systems for control of various pests. Center pivot and lateral move irrigation systems are preferred. Other overhead sprinkler systems; such as end tow, side (wheel) roll and solid set, may be used if they provide uniform water distribution. Do not use filter screens smaller than 50 mesh throughout the system, due to possible build up of material on 100 mesh or smaller screens. Do not apply ROTAM METHOMYL 90SP through any other type of irrigation systems, except those allowed by instructions provided in a supplemental, SLN, or this product label.

General Directions for Chemigation

Preparation

A pesticide tank is recommended for the application of ROTAM METHOMYL 90SP in chemigation systems. Thoroughly clean the injection system and tank of any fertilizer or chemical residues using a standard clean-out procedure. Dispose of any residues in accordance with State and Federal laws. Add 1/4 to 1/2 of the desired amount of water and then measure the required amount of ROTAM METHOMYL 90SP into the tank. Complete filling the tank by adding the required amount of water. Agitate thoroughly to insure a uniform solution of ROTAM METHOMYL 90SP. Once in solution, no further agitation is required. Injection solution should not be stored overnight. Highly alkaline water should be buffered so that the pH of the spray solution is in the range of neutral to slightly acidic (pH5-7)

Injection into Chemigation Systems

Inject the proper amount of the ROTAM METHOMYL 90SP solution to the irrigation water flow using a positive displacement injection pump. Injection should occur at a point in the main irrigation water flow to ensure thorough mixing with the irrigation water. For continuously moving systems, inject the solution containing ROTAM METHOMYL 90SP into the irrigation water line continually and uniformly throughout the irrigation cycle. Apply in no more than 0.2 inches of water per acre. For overhead sprinkler systems that are stationary, add the solution containing ROTAM METHOMYL 90SP to the irrigation water line, and apply no more than 0.2 inches of water per acre, just before the end of the irrigation cycle.

Uniform Water Distribution

The irrigation system used for application of ROTAM METHOMYL 90SP must provide for uniform distribution of ROTAM METHOMYL 90SP treated water. Non-uniform distribution might result in crop injury, lack of effectiveness or illegal pesticide residues in or on the crop being treated. Ensure the irrigation system is calibrated to uniformly distribute the chemigation application to the crop. Contact the equipment manufacturer, the local University Extension agent or other

experts if you have questions about achieving uniform distribution of the application.

Equipment Calibration

Calibrate the irrigation system and injector before applying ROTAM METHOMYL 90SP. Calibrate the injection pump while the system is running using the expected irrigation rate. If you have questions about calibration, you should contact your state extension service specialists, equipment manufacturer or other experts.

Monitoring of Chemigation Applications

A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of a responsible person, shall shut the system down and make necessary adjustments should the need arise. Wear the personal protective equipment as defined in the PPE section of the label for cleaners and repairers of application equipment when making adjustments or repairs on the chemigation system when ROTAM METHOMYL 90SP is in the irrigation water.

Required System Safety Devices

Do not connect any irrigation system used for pesticide applications to a public water system unless the pesticide label-prescribed safety devices are in place. Public water system means a system for the provision to the public of piped water for human consumption, if such a system has at least 15 service connections or regularly serves an average of at least 25 individuals at least 60 days out of the year.

1. The system must contain a functional check valve, vacuum relief valve and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.
2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
5. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
6. Systems must use a metering pump such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
7. Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, backflow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, the water from the public water system should be discharged into a reservoir tank prior to pesticide introduction. There shall be a complete physical break (air gap) between the outlet end of the fill pipe and the top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.

Posting of Areas to be Treated

Posting of areas to be chemigated is required when 1) any part of a treated area

is within 300 feet of sensitive areas such as residential areas, labor camps, businesses, daycare centers, hospitals, in-patient clinics, nursing homes, or any other public areas such as schools, parks, playgrounds, or other public facilities not including public roads, or 2) when the chemigated area is open to the public such as golf courses or retail greenhouses.

Posting must conform to all the following requirements. Treated areas shall be posted with signs at all usual points of entry and along likely routes of approach from the listed sensitive areas. When there are no usual points of entry, signs must be posted in the corners of the treated areas and in any other location affording maximum visibility to sensitive areas. The signs shall be printed in ENGLISH. Signs must be posted prior to application and must remain posted until foliage has dried and soil surface water has disappeared. Signs may remain in place indefinitely as long as they are composed of materials to prevent deterioration and maintain legibility for the duration of the posting period.

All words shall consist of letters at least 2 1/2 inches tall, and all letters and the symbol shall be a color, which sharply contrasts with their immediate background. At the top of the sign shall be the words "KEEP OUT", followed by an octagonal stop sign symbol at least 8 inches in diameter containing the word "STOP". Below the symbol shall be the words "PESTICIDE IN IRRIGATED WATER". Posting for chemigation does not replace other posting and reentry requirements for farm worker safety.

Operation

Start the water pump and sprinkler, and let the system achieve the desired pressure and speed before starting the injector. Start the injector and calibrate the injection system according to the directions above. This procedure is necessary to deliver the desired rate per acre in a uniform manner. Apply ROTAM METHOMYL 90SP in 0.1 to 0.2 inches of water per acre. When the application is finished, allow the entire irrigation and injector system to be thoroughly flushed clean before stopping the system. End guns must be turned off during the application, if they irrigate nontarget areas or if they do not provide uniform application and coverage.

It is recommended that nozzles in the immediate area of control panels, chemical supply tanks, wellheads and system safety devices be plugged to prevent contamination of these areas.

Do not apply when wind speed favors drift beyond the area intended for treatment.

Do not apply when system connections or fittings leak or when nozzles do not provide uniform distribution.

Cleaning the System

Thoroughly clean the injection system and tank of any fertilizer or chemical residues using a standard clean-out procedure. Dispose of any residues in accordance with State and Federal laws. Consult your owner's manual or your local equipment dealer for cleanout procedures for your injection system.

SPRAY DRIFT MANAGEMENT

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops. These requirements do not apply to forestry applications, public health uses or to

applications using formulations.

1. The distance of the outer most nozzles on the boom must not exceed $\frac{3}{4}$ the length of the wingspan or rotor.
2. Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

Where states have more stringent regulations, they should be observed.

The applicator should be familiar with and take into account the information covered in the Aerial Drift Reduction Advisory Information

AERIAL DRIFT REDUCTION ADVISORY INFORMATION

Importance of Droplet Size

The most effective way to reduce drift potential is to apply large droplets (>150 - 200 microns). The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. The presence of sensitive species nearby, the environmental conditions, and pest pressure may affect how an applicator balances drift control and coverage. **APPLYING LARGER DROPLETS REDUCES DRIFT POTENTIAL, BUT WILL NOT PREVENT DRIFT IF APPLICATIONS ARE MADE IMPROPERLY OR UNDER UNFAVORABLE ENVIRONMENTAL CONDITIONS! See WIND, TEMPERATURE AND HUMIDITY, and TEMPERATURE INVERSIONS sections of this label.**

Controlling Droplet Size – General Techniques

- **Volume** - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- **Pressure** - Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types lower pressure produces larger droplets. Use the lower spray pressures recommended for the nozzle. Higher pressure reduces droplet size and does not improve canopy penetration. **WHEN HIGHER FLOW RATES ARE NEEDED, USE A HIGHER-CAPACITY NOZZLE INSTEAD OF INCREASING PRESSURE.**
- **Nozzle Type** - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

Controlling Droplet Size – Aircraft

- **Number of Nozzles** - Use the minimum number of nozzles that provide uniform coverage.
- **Nozzle Orientation** - Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
- **Nozzle Type** - Solid stream nozzles (such as disc and core with swirl plate removed) oriented straight back produce larger droplets than other nozzle types and the lowest drift.
 - **Boom Length** - For some use patterns, reducing the effective boom length to less than $\frac{3}{4}$ of the wingspan or rotor length may further reduce drift without reducing swath width.
 - **Application Height** - Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.
 - **Swath Adjustment** - When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downward edges

of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.)

BOOM HEIGHT

Setting the boom at the lowest labeled height (if specified) which provides uniform coverage reduces the exposure of droplets to evaporation and wind. For ground equipment, the boom should remain level with the crop and have minimal bounce.

WIND

Drift potential is lowest between wind speeds of 3-10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 3 mph due to variable wind direction and high inversion potential. **AVOID GUSTY OR WINDLESS CONDITIONS.**

Note: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

TEMPERATURE AND HUMIDITY

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

TEMPERATURE INVERSIONS

Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain close to the ground and move laterally in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

SENSITIVE AREAS

The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from the sensitive areas).

SHIELDED SPRAYERS

Shielding the boom or individual nozzles can reduce the effects of wind. However, it is the responsibility of the applicator to verify that the shields are preventing drift and not interfering with uniform deposition of the product.

AIR ASSISTED (AIR BLAST) FIELD CROP SPRAYERS

Air assisted field crop sprayers carry droplets to the target via a downward directed air stream. Some may reduce the potential for drift, but if a sprayer is unsuitable for the application and/or set up improperly, high drift potential can

result. It is the responsibility of the applicator to determine if a sprayer is suitable for the intended application, is configured properly, and that drift is not occurring.

Note: Air assisted field sprayers can affect product performance by affecting spray coverage and canopy penetration. Consult the application equipment section of this label to determine if use of an air assisted sprayer is recommended.

AIR ASSISTED (AIR BLAST) TREE AND VINE SPRAYERS

Air assisted tree and vine sprayers carry droplets into the canopy of trees and vines via a radially or laterally directed air stream. These sprayers are not suitable for applying herbicides. In addition to the general drift management principles already described, the following specific practices will further reduce the potential for drift:

- Adjust deflectors and aiming devices so that spray is only directed into the canopy.
- Block off upward pointed nozzles when there is no overhanging canopy.
- Use only enough air volume to penetrate the canopy and provide good coverage.
- Do not allow spray to go beyond the edge of the cultivated area. Spray the outside row only from outside the planting.

CROP AND RATE CHARTS

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Alfalfa	Pea Aphid Lygus Bugs Blotch Leafminer Aphids Egyptian Alfalfa Weevil Larvae Loopers Beet Armyworm Armyworm Alfalfa Caterpillar Fall Armyworm Western Yellowstriped Armyworm Yellowstriped Armyworm	1/2 – 1	7 *	48 hrs
	Alfalfa Weevil Larvae	1		
	Variegated Cutworm	1/4 - 1		
	Do not apply to dormant or semi-dormant alfalfa when min. daily temp. is 50° F, or lower. Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. * Do not apply within 7 days of cutting or allowing livestock to graze.			
Anise (Fennel)	Cabbage Looper	1	7	48 hrs
	Beet Armyworm	1/2 - 1		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop			
Apple(Ground application only)	Apple Aphid Rosy Apple Aphid Tufted Apple Budmoth Green Fruitworm Tarnished Plant Bug	1/2 - 1 *	14	72 hrs
	Codling Moth (10-12 day spray intervals)			
	Leafrollers (Fruit-tree, Obliquebanded, Redbanded, Variegated) Lesser Appleworm White Apple Leafhopper Tentiform Leafminer Cutworm	1 *		
Do not use on Early Macintosh & Wealthy varieties Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 5 applications per crop; minimum interval between treatments is 7 days. * Apply in a minimum of 50 gallons of water per acre.				

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Asparagus	Beet Armyworm, Western Yellowstriped Armyworm Asparagus Beetle Spotted Asparagus Beetle White Cutworm Redbacked Cutworm	1/2 - 1	1	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Avocado	Western Avocado Leafroller Omnivorous Looper	1/2 - 1	1	48 hrs
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Barley	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs
	<p>Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).</p>			
Beans (Succulent) Including: Kidney, Lima, Mung, Navy, Pinto, Snap, Wax, Broad, Fava, Asparagus, Blackeyed peas Cowpeas, Chick peas, Garbanzo beans, Sweet lupine, White sweet lupine White lupine,	Leafhopper Mexican Bean Beetle	1/4 - 1	Succulent Beans 1/4 - 1/2 lb.-- 1, over 1/2 lb. -- 3; 3 Vines 7 Hay	48 hrs
	Fall Armyworm Variegated Cutworm	1/2		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Grain lupine	Corn Earworm Saltmarsh Caterpillar, Yellowstriped Armyworm Western Yellowstriped Armyworm, Lygus Bugs Thrips Aphids Loopers*	1/2 – 1		
	European Corn Borer (Ovicide & Larvicide)-- Initiate when moth flights first appear and-continue preventive treatments at 3-4 day intervals to control eggs and			
	Spotted Cucumber Beetle	1/4 – 1/2		
	Succulent Beans - Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. * Do not use for Loopers in AL & GA.			
Beans (Dry) (Follow Beans, Succulent)	(Follow Beans, Succulent)	(Follow Beans, Succulent)	14 - Dry Beans * 14 - Vines * 14 - Hay *	48 hrs
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting.			
Beets (Table)	Imported Cabbageworm	1/4 - 1	0 - roots 10 - tops	48 hrs
	Beet Armyworm Cabbage Looper Diamondback Moth	1/2 - 1		
	Cucumber Beetle Variegated Cutworm	1/2		
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Bermudagrass pasture	Fall Armyworm Armyworm Striped Grass Looper	1/4 - 1	7 - Forage * 3 - Dehydrated Hay **	48 hrs
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. * Do not apply within 7 days of feeding forage or allowing livestock to graze. ** Do not apply within 3 days of cutting for hay.			
Blueberries	Blueberry Leafhopper Aphids Tussock Moth Weevil Sharp-Nosed Leafhopper	1/2	3	48 hrs

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
	Cranberry Fruitworm* Cherry Fruitworm*	1/2 - 1		
	Flea Beetle (larvae) Sawfly (larvae) Blueberry Leafroller	1		
	Blueberry Maggot	1/4 - 1/2		
	Do not apply during bloom. Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than applications per crop. * For ground use only.			
Broccoli	Loopers, Diamondback Moth	1/2 - 1 **	3	48 hrs
	Imported Cabbageworm	1/4 - 1 **		
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. ** Add a wetting agent to improve coverage.			
Brussels Sprouts	Loopers Imported Cabbageworm, Diamondback Moth	1/2 - 1 **	3	48 hrs
	Variegated Cutworm	1/2 **		
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. ** Add a wetting agent to improve coverage			
Cabbage	Loopers * Diamondback Moth Fall Armyworm	1/2 - 1 **	1	48 hrs
	Imported Cabbageworm	1/4 - 1 **		
	Variegated Cutworm	1/2 **		
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 15 applications per crop; minimum interval between treatments is 2 days. * Do not use for Loopers in AL & GA. ** Add a wetting agent to improve coverage			
Carrot	Beet Armyworm Armyworms Aster Leafhopper	1/2 - 1	1	48 hrs
	Variegated Cutworm	1/4 - 1/2		
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Cauliflower	Imported Cabbageworm	1/4 - 1 **	3	48 hrs
	Loopers Diamondback Moth	1/2 - 1 **		
	Variegated Cutworm	1/2 **		
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. ** Add a wetting agent to improve coverage.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Celery	Beet Armyworm Aster Leafhopper	1/2 - 1	7	48 hrs
	Loopers	1		
	Variegated Cutworm	1/2		
	Armyworms	1/4 - 1		
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Chicory	Beet Armyworm Variegated Cutworm Leafhoppers	1/2 - 1	80	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Chinese Cabbage	Loopers Beet Armyworm	1/2 - 1*	10	48 hrs
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP/acre/crop. Do not make more than 10 applications/crop. * Minimum of 25 gallons water per acre by ground or 5 gallons by air.			
Collards (Fresh market only)	Diamondback Moth Variegated Cutworm	1/2	10	48 hrs
	Imported Cabbageworm Beet Armyworm Loopers*	1/2 - 1		
	Do not apply when temperature is less than 50° F. Do not apply when crop is less than 10" tall. Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop. * Do not use for Loopers in AL & GA.			
Corn (Field, Popcorn & Seed)	Earworm (Ovicide/Larvicide) Armyworm Fall Armyworm European Corn Borer- Ears 1-3 days or as needed Corn Rootworm (adult beetles) Flea Beetles Picnic Beetles Aphids	1/4 - 1/2	21- Ears 3 - Forage* 21 - Stover*	48 hrs
	Variegated Cutworm, Beet Armyworm	1/2		
	Do not apply more than 2.5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. *Corn forage is green actively growing plants that are harvested with the ears intact, then plants can be fed directly to animals or used to make silage. Corn stover are the parts of the plant that remain after removal of the grain at full plant maturity. These remaining stalks and leaves can be fed as roughage to animals.			
Corn (Sweet)	Earworm—Whorl as needed	1/3 - 1/2	0 - Ears 3 - Forage 21- Stover	48 hrs
	Fall Armyworm Armyworm Earworm,- (Ovicide/Larvicide)	1/4 - 1/2		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
	European Corn Borer- Ears 1-3 days or as needed Corn Rootworm (adult beetles) Flea Beetles Picnic Beetles Aphids			
	Variegated Cutworm Beet Armyworm	1/2		
	Certain hybrid varieties of sweet corn are susceptible to methomyl injury. Treat a small area to determine crop safety before full scale spraying. Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 28 applications per crop; minimum interval between treatments is 1 day.			
Cotton All U.S.	Ovicide/Larvicide - Bollworm, Tobacco Budworm (Initiate schedule when significant numbers of eggs are present Continue at 3 to 5-day intervals while eggs are present and larval control is adequate. If significant larvae survive, use higher rates below.) Lygus Bugs/Plant Bugs (adults and nymphs) start treatment on low level population for suppression.	1/8 - 1/4 (see Insect Predator Section)	15	72 hrs
	Cotton Leafworm	1/4 - 1/2		
	Cotton Fleahopper (as needed)	1/8 - 1/4		
	Aphids, Thrips	1/4		
East of Rockies Only	(Early Season) Bollworm, Tobacco Budworm, Beet Armyworm, Cotton Leafperforator, Fall Armyworm, Lygus Bugs/Plant Bugs (adults and nymphs) Use as occasional spray in regular schedule but not more often than every 10 days.	1/2		
East of Rockies	(Late Season)	1/2 - 3/4	15	72 hrs

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Only	Bollworm, Tobacco Budworm, Beet Armyworm, Cotton Leafperforator, Fall Armyworm, Lygus Bugs/Plant Bugs (adult and nymphs). Up to 3 applications at 3-5 day intervals after desired boll load set on plants.			
Texas	Cotton Aphid	1/4 - 2/3		
West of Rockies only	Larvicide for worms Bollworm, Fall Armyworm, Tobacco Budworm, Lygus Bugs Beet Armyworm	1/2 - 3/4		
	Cotton Leafperforator	1/3 - 3/4		
	For applications West of the Rockies, make applications on 3-5 day intervals after desired boll load set on plants. For all cotton applications: Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop. Use may redden cotton. If excessive stop or alternate with other insecticides. Do not graze or feed.			
Cucumber	Loopers Tobacco Budworm Beet Armyworm, Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickleworm Fall Armyworm	1/2 - 1	1/2 lb. -- 1 Over 1/2 lb.- 3	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 12 applications per crop.			
Eggplant	Green Peach Aphid	1/4 - 1	5	48 hrs
	Tomato Pinworm (Ground Application only) Beet Armyworm Corn Earworm	1/2 - 1		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Endive, Escarole	Beet Armyworm	1/2 - 1	10	48 hrs
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Garlic	Beet Armyworm	1/2 **	7	48 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
	Do not make more than 6 applications per crop. ** Add a wetting agent to improve coverage.			
Grapefruit CA, AZ & HI only	Thrips Fruitree Leafroller Orange Tortrix Western Tussock Moth Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Grapes East of Rockies only	Grape Berry Moth (apply pre- & post- bloom & repeat at 10-14 day intervals or as needed) Leafhoppers	1/2 - 1	1 - Fresh & Raisin 14 - Wine Grapes	7 days
All U.S.	Omnivorous Leafroller, Grape Leaffolder Orange Tortrix			
West of Rockies only	Saltmarsh Caterpillar Leafhoppers*			
	Climbing Cutworm (Treat infestation and repeat at 7-14 day intervals as needed)	1		
CA only	Grape Leaf Skeletonizer*	1/2 - 1		
	Thrips	1/2 - 1		
	For all applications made to grapes in the United States: Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 5 applications per crop. * Leafhoppers & Grape Leaf Skeletonizer (Ground Application Only).			
Horseradish Ground application only	Aphids Thrips	1/2	65	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application - Days To Harvest	REI
Leafy Green Vegetables: Beet (tops) Dandelions, Kale, Mustard Greens, Parsley, Swiss Chard, Turnip Greens	Beet Armyworm Cabbage Looper* Diamondback Moth Imported Cabbageworm	1/2 - 1	10	48 hrs
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop . * Do not use for Cabbage Loopers in AL & GA.			
Lemon CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Lentils	Western Yellowstriped Armyworm	1/2 - 1	21	48 hrs
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Lettuce (Head and Leaf varieties)	Alfalfa Looper	1/4 - 1	1/4-1/2 lb. - 7 over 1/2 lb. - 10	48 hrs
	Thrips Aphids Beet Armyworm Cabbage Looper Corn Earworm Aster Leafhopper	1/2 - 1		
	Variegated Cutworm	1/2		
	Lettuce (head varieties) Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 15 applications per crop; minimum interval between treatments is 2 days. Lettuce (leaf varieties) Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop; minimum interval between treatments is 2 days.			
Melons Including: Canteloupe Casaba Santa Claus melon Crenshaw melon Honeydew melon Honey balls Persian melon Golden Pershaw melon Mango melon Pineapple melon Snake melon Watermelon	Loopers Tobacco Budworm Beet Armyworm Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickleworm Fall Armyworm	1/2 - 1	1/2 lb. -- 1 over 1/2 lb. -- 3	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 12 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application - Days To Harvest	REI
Mint (Peppermint, Spearmint)	Variegated Cutworm Alfalfa Looper	1	14	48 hrs
	Flea Beetles	3/4 - 1		
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Nectarine CA & AZ only	Thrips	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 3 applications per crop.			
Oats	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).			
Onions (Green & Dry Bulb)	Beet Armyworm	1/2 - 1 **	7 - Green and Dry Bulb Onions	48 hrs
	Thrips* Variegated Cutworm Black Cutworm	1 **		
	Onions, green Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop; minimum interval between treatments is 5 days. Onions, dry bulb Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop; minimum treatment interval between treatments is 5 days. *Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation to control thrips. Begin applications before thrip populations reach 3-5 thrips per plant. For best results, add a wetting agent. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. ** Add a wetting agent to improve coverage.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Oranges CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix Fruittree Leafroller Beet Armyworm Citrus Cutworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Peaches	Catfacing Insects (Plant Bugs and Stink Bugs) - begin at petal fall and continue in cover sprays at 7-to 10-day intervals Oriental Fruit Moth* -begin at petal fall; use trapping devices and frequent field inspection to determine need for treatment. Continue treatment in cover sprays and alternate with residual-type insecticides registered for this use. Green Peach Aphid	1 lb (or 1/4 lb per 100 gal up to 400 gal per acre)	4	4 days
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 6 applications per crop. * Oriental Fruit Moth (Ground Application Only).			
Peanuts	Corn Earworm* Potato Leafhopper Fall Armyworm	1/4 - 1	21	48 hrs
	Beet Armyworm	3/8 - 1		
	Green Cloverworm Velvetbean Caterpillar Cabbage Looper Soybean Looper ** Thrips Granulate Cutworm	1/2 - 1		
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop. * ROTAM METHOMYL 90SP has ovicidal and larvicidal control on corn earworm. **Soybean Looper is difficult to control. Do not apply to worms greater than 1 per 2" long. Use higher rate for severe infestations. Do not feed treated vines.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application - Days To Harvest	REI
Pears Northeast only	Green Fruitworm Oblique banded Leafroller	1/2 - 1 *	7	48 hrs
Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop. * Apply in a minimum of 50 gallons of water per acre.				
Peas (succulent) Including: Pigeon peas Chick peas Garbanzo beans Dwarf peas Garden peas Green peas English Peas Field peas Edible pod peas	Alfalfa Looper Cabbage Looper* Pea Aphid Beet Armyworm Saltmarsh Caterpillar Variegated Cutworm	1/2 - 1	1 - Peas 5 - Forage 14 - Hay	48 hrs
	Alfalfa Caterpillar Armyworm Green Cloverworm	1/4 - 1		
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 6 applications per crop; minimum interval between treatments is 3 days. * Do not use for Cabbage Loopers in AL & GA.			
Pecans Southeast only	Aphids	1/2 - 1	30	48 hrs
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP/acre/crop. Do not make more than 7 applications per crop.			
Peppers Including: Bell Hot Pimentos Sweet	Loopers Beet Armyworm Green Peach Aphid Armyworm Fall Armyworm	1/2 - 1	3	48 hrs
	Variegated Cutworm	1/4 - 1/2		
	European Corn Borer	1		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Pomegranates	Omnivorous Leafroller	1	14	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Potato	Tuberworm* Loopers Aphids Beet Armyworm Leafhoppers Fall Armyworm	1/2 - 1	6	48 hrs
	Variegated Cutworm Flea Beetles	1/2		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Potato (cont.)	<p>Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section.</p> <p>*Repeat applications of ROTAM METHOMYL 90SP on a 5-7 day schedule, or longer as needed, to control tuber worm populations. An application schedule of effective insecticides with different modes of action may be needed to keep foliar feeding larval populations as low as possible prior to harvest to reduce the risk of larval damage to the tubers. Failure to adequately control tuberworm larvae prior to crop senescence or vine kill increases the risk of tuber damage.</p>			
Rye	<p>Armyworms</p> <p>Cereal Leaf Beetle*</p> <p>Aphids**</p>	1/4 - 1/2	7	48 hrs
	<p>Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.</p> <p>Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information.</p> <p>*Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California.</p> <p>**Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).</p>			
Sorghum	Sorghum Webworm	1/2 *	14 **	48 hrs
Including: Sudangrass (Except Sweet Sorghum)	<p>Sorghum Midge</p> <p>--Apply when 50% bloom and 3-5 days later if needed.</p> <p>Fall Armyworm (Budworm)</p> <p>Beet Armyworm</p> <p>Corn Earworm</p> <p>Armyworm</p>	1/4 - 1/2 *		
	<p>Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.</p> <p>* Minimum of 10 gallons per acre by ground or 2 gallons per acre by air.</p> <p>** Do not apply within 14 days of feeding forage or cutting for hay.</p>			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Soybeans	Green Cloverworm Velvetbean Caterpillar Mexican Bean Beetle Corn Earworm Light to Moderate infestations	1/8 - 1/4 (see Insect Predator section)	14 - Soybeans 3 - Forage 12 - Hay	48 hrs
	Moderate to severe infestations	1/4 - 1/2		
	Soybean Aphid	1/6 - 1/3		
	Beet Armyworm Salt Marsh Caterpillar Bean Leaf Beetle Fall Armyworm Thrips Silver Spotted Skipper Light to Moderate infestations	1/4 - 3/8		
	Moderate to severe infestations	3/8 - 1/2		
	Do not apply more than 1.5 pounds of ROTAM METHOMYL 0SP per acre per crop. Do not make more than 3 applications per crop.			
Spinach	Alfalfa Loopers Cabbage Looper Beet Armyworm Fall Armyworm	1/2 - 1	7	48 hrs
	Variegated Cutworm	1/2		
	Do not apply when minimum daily temperature is 32° F, or lower. Do not apply to seedlings less than 3" diameter. Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Sugar Beet	Beet Webworm Flea Beetles Carrion Beetles Beet Armyworm* Aphids* Western Yellowstriped Armyworm*	1/4 - 1	30 -Tops 21 - Roots	48 hrs
	Variegated Cutworm	1/2		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Sugar Beet (cont.)	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. *Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation to control beet armyworm, aphids and western yellowstriped armyworm. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information.			
Summer Squash* Including: Crookneck squash Straightneck squash Scallop squash Vegetable marrow Spaghetti squash Hyotan Cucuzza Hechima Chinese okra Bitter melon Balsam pear Balsam apple Chinese Cucumber	Loopers Tobacco Budworm Beet Armyworm Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickleworm Fall Armyworm	1/2 - 1	1/2 lb. -- 1 day over 1/2 lb.-- 3 days	48 hrs
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 12 applications per crop. *Fruit of the Gourd (Cucurbit accae) family that are consumed when immature, 100% of the fruit is edible cooked or raw, once picked cannot be stored, has a soft rind which is easily penetrated, and if seeds were harvested they would not germinate.			
Tangelo, Tangerine CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix, Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Tobacco (Except shade)	Flea Beetle Hornworm	1/4 - 1/2	5 - Flue cured 14 - Air or fire cured	48 hrs
	Loopers Aphids Tobacco Budworm Fall Armyworm	1/2		
	Do not apply more than 2.5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 5 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Tomato (Including Tomatillos*)	Tomato Fruitworm Aphids Hornworm Loopers Beet Armyworm Southern Armyworm Pinworm Armyworm Fall Armyworm	1/2 - 1	1	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop Do not make more than 16 applications per crop. * For tomatillos do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop . Do not make more than 5 applications per crop.			
Turf (For use on sod farms only)	Sod Webworm (after application, sprinkle irrigate for 15 minutes)	1 (2/5 ozs. per 1000 sq. ft.)		48 hrs
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Do not graze or feed.			
Wheat	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications to s on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).			

redo per 352-342 ✓

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

Pesticide Storage: Store in a tightly closed container in a cool, dry place.

Prohibitions: Do not reuse empty container.

Pesticide Disposal: Pesticide spray mixture or rinsate that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticides. Improper disposal of excess pesticide spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by the use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal: For Water Soluble Packets: Do not reuse the outer box or the resealable plastic bag. When all water-soluble packets are used, the outer packaging should be clean and may be disposed of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by open burning. If burned, stay out of smoke. If the resealable plastic bag contacts the formulated product in any way, the bag must be triple-rinsed with clean water. Add the rinsate to the spray tank and dispose of the outer wrap as described above.

For Paper and Plastic Bags: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

SPILLS: For minor spills, leaks, etc., follow all precautions indicated on this label and clean up immediately. Take special care to avoid contamination of equipment and facilities during cleanup procedures and disposal of wastes.

In the event of a major spill, fire or other emergency, call CHEMTREC, day or night, 1-800-424-9300.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Rotam Agrochemical Company Limited or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Rotam Agrochemical Company Limited and Seller harmless for any claims relating to such factors.

Rotam Agrochemical Company Limited warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Rotam Agrochemical Company Limited, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW ROTAM LTD MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the extent consistent with applicable law, Rotam Agrochemical Company Limited or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ROTAM AGROCHEMICAL COMPANY LIMITED AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ROTAM AGROCHEMICAL COMPANY LIMITED OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Rotam Agrochemical Company Limited and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of Rotam Agrochemical Company Limited.

Manufactured by:
Rotam Agrochemical Company Ltd.
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong
1-866-927-6826

Registered: [TBA]

RESTRICTED USE PESTICIDE

Due to high Acute Toxicity to Humans

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

GROUP

1A

INSECTICIDE

Rotam Methomyl 90SP Insecticide

In Water Soluble Packets

Active Ingredient

Methomyl

(S-methyl-N-[(methylcarbamoyl)
oxy]thioacetimidate)

90%

Inert Ingredients

10%

TOTAL

100%

EPA Reg. No. 83100 – TBA

EPA Est. No.: TBA

KEEP OUT OF REACH OF CHILDREN
DANGER POISON



PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See additional Precautionary Statements on inside booklet and back panel of container and Directions For Use on inside booklet.

FIRST AID
(N-Methyl Carbamate insecticide)

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

ATROPINE IS AN ANTIDOTE. SEEK MEDICAL ATTENTION AT ONCE IN ALL CASES OF SUSPECTED POISONING.

If poisoning symptoms appear (see POISONING SYMPTOMS), get medical attention.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

PRECAUTIONARY STATEMENTS

**HAZARDS TO HUMANS
AND DOMESTIC ANIMALS**

DANGER. FATAL IF SWALLOWED. MAY BE FATAL IF INHALED OR GETS IN EYES. DO NOT BREATHE DUST OR SPRAY MIST.

Do not get in eyes or on clothing. Wear protective eyewear and respirator. Harmful if absorbed through skin. Avoid contact with skin. Wash hands thoroughly with soap and water after handling.

POISONING SYMPTOMS: Methomyl poisoning produces effects associated with anticholinesterase activity which may include weakness, blurred vision, headache, nausea, abdominal cramps, discomfort in the chest, constriction of pupils, sweating, slow pulse, muscle tremors. If poisoning symptoms appear, refer to First Aid section on the ROTAM METHOMYL 90SP label and seek medical attention at once.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

TREATMENT: Atropine sulfate should be used for treatment. Administer repeated doses, 1.2 to 2.0 mg. intravenously every 10 to 30 minutes until full atropinization is achieved. Maintain atropinization until the patient recovers. Artificial respiration or oxygen may be necessary. Allow no further exposure to any cholinesterase inhibitor until recovery is assured.

Do not use 2-PAM for exposure to ROTAM METHOMYL 90SP alone. However, for exposure to combinations of ROTAM METHOMYL 90SP and

organophosphorus insecticides, 2-PAM may be used as recommended to supplement the atropine sulfate treatment. Do not use morphine.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, and mammals. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high-water mark. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area. This chemical is known to leach through soil into groundwater under certain conditions as a result of label use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

This chemical can contaminate surface water through spray drift. Under some conditions, it may also have a high potential for runoff into surface water for several days to weeks after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, and areas overlaying extremely shallow groundwater, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas over-laying tile drainage systems that drain to surface water.

PHYSICAL AND CHEMICAL HAZARDS

Keep container closed. Use with adequate ventilation.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

Storage: Store in a tightly closed container in a cool, dry place.

Prohibitions: Do not reuse empty container.

Pesticide Disposal: Pesticide spray mixture or rinsate that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticides. Improper disposal of excess pesticide spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by the use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal: For Water Soluble Packets: Do not reuse the outer box or the resealable plastic bag. When all water-soluble packets are used, the outer packaging should be clean and may be disposed of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by open burning. If burned, stay out of smoke. If the resealable plastic bag contacts the formulated product in any way, the bag must be triple-rinsed with clean water. Add the rinsate to the spray tank and dispose of the outer wrap as described above.

For Paper and Plastic Bags: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

SPILLS: For minor spills, leaks, etc., follow all precautions indicated on this label and clean up immediately. Take special care to avoid contamination of equipment and facilities during cleanup procedures and disposal of wastes. **In the event of a major spill, fire or other emergency, call CHEMTREC, day or night, 1-800-424-9300.**

Manufactured by:
Rotam Agrochemical Company Ltd.
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong
1-866-927-6826

Net Contents:
Packets/Container

Registered:

83100 - E1

waiting on
Jacket

12/20

Memorandum

Date: 12 / 17 / 10

To: PM >, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☐ fully accepted submission
☐ partially accepted submission
☒ rejected submission

*already
routed
- PM must
have jacket
(Tom/Harris)*

Rejected

(01)

Studies



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

December 17, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

FRANK E. SOBOTKA, PH.D.
IPM RESOURCES LLC
ROTAM AGROCHEMICAL COMPANY LIMITED
7/F CHEUNG TAT CENTRE
4032 CROCKERS LAKE BLVD., STE 818
SARASOTA, FL 43238-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 10-DEC-10. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

We are unable to accept your data submittal for further processing and review, because of the significant deficiencies noted below. It is being returned to you for correction. If deficiencies were found which apply to your overall submission, they are described immediately following this paragraph. If problems are found with individual studies, they are described below linked to the study identifier found on the enclosed copy of your bibliography.

Rejected Study [01]:

* Judging from the pagination of the study, pages 01 - 34 were omitted from the submitted copy.

Receipt for Section 3

S: 887110

Resubmission: ☒ Yes ☐ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: New Registration

Billable: ☐ Yes ☒ No

Company: 83100 ROTAM AGROCHEMICAL COMPANY LIMITED V

Risk Manager: Registration Division, Risk Management Team 7

Product #: 83100-EI Product Name: ROTAM METHOMYL 90SP INSECTICIDE

Override#:

Me Too Section3: 352-342 Me Too Product Name: DUPONT LANNATE SP INSECTICIDE

Application Date: 07-Dec-2010

OPP Rec'd Date: 10-Dec-2010

Front End Date: 10-Dec-2010

Risk Manager Send Date: 10-Dec-2010

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

addendum to MRID 4822601

Form A: ☐ Signature Date:

Form B: ☐ Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Des

Study

View/Edit

New Ingredient Request Date:

New Ingredient Received Date:

IPM Resources LLC

4032 Crockers Lake Blvd., Suite 818, Sarasota, FL 34238 Phone: (215) 497-9501 Fax: (215) 497-9502

"an intellectual property management resource company"

VIA UPS EXPRESS

December 07, 2010

*Studies rejected
for MRID*
*superseded/replaced by submission
dated 3/10/11*

hebert.john@epa.gov

[REF. ☎ 1 -703-308-6249]

Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501
ATTN: John Hebert PM 7

SUBJECT: Application for Registration - Rotam Methomyl 90SP Insecticide
Submission of Addendum to Volume 1-R (ADDENDUM I)
EPA File Symbol 83100 - EI

Dear Mr. Hebert :

The purpose of this letter is to transmit to the Agency on behalf of Rotam Agrochemical Company Limited an Addendum (ADDENDUM I) to MRID 48226101 (Volume 1-R/Product Chemistry Group A) for the above subject Product Submission in review.. Rotam is requesting that a new MRID number be issued for this report, and, the report added to MRID 48226191 for review.

Addendum I adds a second Confidential Statement of Formula (Alternative CSF) with supporting information on the Products Identity and Disclosure of Ingredients, including Manufacturing Process, for an Alternative Formulation containing a colorant. The specified Colorant (inert dye) is a Food Grade Colorant approved for direct application and packaging of food products.

The addition of a colorant incorporates better stewardship of the product by allowing the end-user to identify the presence of the product in the tank when mixing and applying the product.

Rotam trusts that the Agency will give this use special consideration when evaluating the products "significant similarity" in composition with respect to FIFRA Section 3(c)(3)(b)(i). The following documents are enclosed with this submission:

Administrative Materials: (MRID No.: _____)

- Transmittal Form (EPA Form 8570-1)
- Confidential Statement of Formula (EPA Form 8570-4), 2 Copies

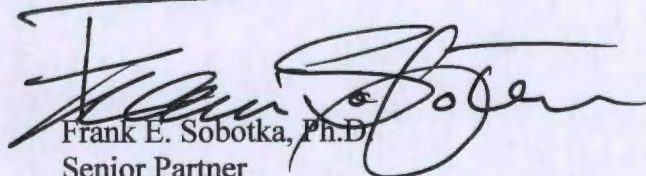
**SUBJECT: Application for Registration - Rotam Methomyl 90SP Insecticide/Continued
EPA File Symbol 83100 - EI**

Three copies each of the following:

VOLUME NO.	DESCRIPTION	OPPTS GUIDELINE REF. NO.	MRID NO.
1-R ADDENDUM I	Product Identity & Disclosure of Ingredients, Including Manufacturing Process/Rotam Methomyl 90SP Insecticide [Report No.: METHMYL 90SP]	Group A 830.1550 830.1600 830.1650	Reject (01)

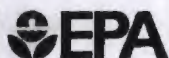
We appreciate your assistance with this Application. If you have any questions or need additional information, please do not hesitate to contact us at any time.

Sincerely yours,



Frank E. Sobotka, Ph.D.
Senior Partner
IPM Resources LLC (Agent)

ATT:



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Rotam Agrochemical Company Ltd / 83100	2. EPA Product Manager John Hebert	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) Rotam Methomyl 90SP Insecticide (83100-EI)	PM# 7	
5. Name and Address of Applicant (Include ZIP Code) ROTAM Agrochemical Company Limited C/O IPM Resources LLC (Agent) 4032 Crockers Lake Blvd., Suite 818 Sarasota, FL 34238 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 352-342 Product Name DuPont Lannate SP	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of Addendum (Addendum I) to Volume 1-R Product Chemistry Group A (MRID 48226101) for Rotam Methomyl 90SP Insecticide (83100-EI). The Addendum adds an Alternative Confidential Statement of Formula (CSF), adding use of a Food Use Colorant into the Basic Formulation.

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Water Soluble Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. 24/12/10 lb bag	No. per container 24/6/4 /case	If "Yes" Package wgt 0.5/2/5 lbs/bag	No. per container 1/1/2 /bag
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product Printed or glued		<input checked="" type="checkbox"/> Lithograph Paper glued Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Frank E. Sobotka, Ph.D.		Title Agent	
		Telephone No. (Include Area Code) 215 497-9501	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Agent	
4. Typed Name Frank E. Sobotka, Ph.D.		5. Date December 07, 2010	

21-Day Screen Completed by
Contractor

21-Day Expires on 10-5-10

Jacket # 83100-EI
MRID# 482261

Content Screen: Recommended to
Pass/Fail

86-5 Review: **Passed/Failed/NA**

Transfer This Jacket to:

STEPHEN SCHAIBLE

PM-7

Completion of 21-Day Content Screen

PM- 7

EPA Reg. # (File Symbol) 83100-ET

Decision # D

Data package delivered to
you on 10/1/10.
(date)

Jacket/Mini-jacket will be
transferred to you today.
(Pick up from Document Center)

Thank you,



Registration Division's 21-Day Content Team

Memorandum

Date: 9 / 22 / 10

To: PM >, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☒ fully accepted submission
☐ partially accepted submission
☐ rejected submission



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 21, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

IPM RESOURCES LLC
ROTAM AGROCHEMICAL COMPANY LIMITED
7/F CHEUNG TAT CENTRE
4032 CROCKERS LAKE BLVD., STE 818
SARASOTA, FL 43238-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 14-SEP-10. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Receipt for Section 3

S: 862202

Regulatory Type: Product Registration - Section 3

Application Type: New Registration

Company: 83100 ROTAM AGROCHEMICAL COMPANY LIMITED

Risk Manager: Registration Division, Risk Management Team 7

Product #: 83100-EI

Override#:

Me Too Section3: 352-342

Application Date: 08-Sep-2010

Front End Date: 15-Sep-2010

FFS Due Date:

OPP Target Date:

Fast Track:

Receipt Description: New registration

Form A:

Resubmission: Yes No

Fee For Service: Yes No

Billable: Yes No

Me Too Product Name: DUPONT LANNATE SP INSECTICIDE

OPP Rec'd Date: 14-Sep-2010

Risk Manager Send Date:

Negotiated Due Date:

New Ingredient:

Request Date:

New Ingredient:

Received Date:

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Study

CSF

View/Edit

V

IPM Resources LLC

482261-00

4032 Crockers Lake Blvd., Suite 818, Sarasota, FL 34238 Phone: (215) 497-9501 Fax: (215) 497-9502

"an intellectual property management resource company"

September 10, 2010

VIA UPS EXPRESS

hebert.john@epa.gov

[REF. ☎ 1 -703-308-6249]

Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501
ATTN: John Hebert PM 7

SUBJECT: Application for Registration - Rotam Methomyl 90SP Insecticide
EPA File Symbol 83100 - _____

Dear Mr. Hebert :

The purpose of this letter is to transmit to the Agency on behalf of ROTAM AGROCHEMICAL COMPANY LTD. a "Me Too" application to register Rotam Methomyl 90SP Insecticide. This product is similar or identical in composition and labeling to DuPont Lannate SP (EPA Reg. No. [REDACTED]).

All data to support this registration are included in this submission, or cited using cite-all method of data support, except for two Group B Physical/Chemical Property studies, Storage Stability and Corrosion Characteristics. These two studies will be conducted and a report sent to the Agency upon completion.

This End Use Product will be formulated using Rotam Methomyl Technical. A Formulator's Exemption Statement has been included in this submission. Please note that an application to support registration of Rotam Methomyl Technical was submitted approximately one week earlier.

John Hebert, PM 7
EPA Registrations Branch
September 10, 2010

Page 2

**SUBJECT: Application for Registration - Rotam Methomyl 90SP Insecticide/
Continued EPA File Symbol 83100 - To be Added**

The following are enclosed in this submission:

Administrative Materials: (MRID No.: _____)

- Transmittal Form (EPA Form 8570-1)
- PRIA Prepay Receipt
- Certification With Respect to Citation of Data (EPA Form 8570-34)
- Data Matrix (EPA Form 8570-35) w/Redacted version
- Formulator's Exemption Statement (EPA Form 8570-27)
- Confidential Statement of Formula (EPA Form 8570-4), 2 Extra Copies
- Draft Labeling Rotam Methomyl 90SP Insecticide, 5 Copies
- Three copies each of the following:

VOLUME NO.	DESCRIPTION	OPPTS GUIDELINE REF. NO.	MRID NO.
1-R	Product Identity & Disclosure of Ingredients, Including Manufacturing Process & Discussion of Formation of Impurities/Rotam Methomyl 90SP Insecticide [Report No.: METHMYL 90SP]	Group A 830.1550 830.1600 830.1650 830.1670	48226101
2	VOLUME 2 NOT SUBMITTED		
3	Enforcement Analytical Method (Active Ingredient Content)/ Rotam Methomyl 90SP Insecticide[Report No.:SOP20458-III]	830.1800	48226102

4	Determination of Physical and Chemical Properties of Rotam Methomyl 90SP Insecticide [Report No.: 22381]	Group B 830.6302 830.6303 830.6304 830.6313 830.6314 830.7000 830.7050	48226103
5	THIS VOLUME 5 NOT SUBMITTED		
6	Acute Toxicology Studies Rotam Methomyl 90SP Insecticide [Report No.: 2918 to 2923]	870.1100 870.1200 870.1300 870.2400 870.2500 870.2600	48226104

~~Sincerely yours,~~

ATT:

NEW APPLICATIONS

DATE: 9/15/10

[Handwritten signature]

FILE NUMBER: 88100-EI

FEP (OPPIN ENTRY) gem 9/15/10
(Initial & date)

FILE ROOM: _____
(Initial & date)

SIG: _____
(Initial & date)

FILE ROOM: _____
(Initial & date)

X ASSIGN TO PM 7 (NO DATA)

____ JACKET TO SHELF (DATA)

PRIA 2 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

21 Day Screen Start Date: 9-14-10 ^{3/23/09}
 Experts In-Processing Signature: B. R Date 9-16-10 Fee Paid: Yes ☒
 Division management contacted on issues No ☐ Yes ☐ Date _____

EPA Reg. Number: <u>83100-ET</u>		EPA Receipt Date: <u>9-14-10</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1)(link to form) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4) (Link to form)			X		
	a) All inerts (link to http://www.epa.gov/oppr001/inerts/), including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
		X				
3	Certification with Respect to Citation of Data (EPA Form 8570-34) (Link to form) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) (Link to form) completed and signed (N/A if source is unregistered or applicant owns the technical)			X		
	Data Matrix (EPA Form 8570-35) (Link to form) both internal and external copies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if 100% repack)			X		
5	a) Selective Method (Fee category experts use)	yes	no			
		X				
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of Label (link to http://www.epa.gov/oppead1/labeling/lrm/) (Electronic labels on CD are encouraged and guidance is available)(link to http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels)			X		

7	Is the data package consistent with PR Notice 86-5 (link to PRN 86-5)	X		
8	Notice of Filing (link to http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm) included with petitions (link to http://www.epa.gov/pesticides/regulating/tolerances.htm)			X
9	If applicable for conventional applications, reduced risk rationale (link to http://www.epa.gov/opprd001/workplan/reducedrisk.html)			X
10	Required Data (link to http://www.epa.gov/pesticides/regulating/data_requirements.htm) and/or data waivers. See Footnote C.			
	a) List study (or studies) not included with application			

Comments:

- Inerts approved for food use under 40 CFR 180.920, preharvest app.
- According to the registrant, guidelines 830.6317, 6319, 6320, 6321 were not submitted because they don't apply to the product properties of this product (see data matrix footnotes)
Guideline 830.1700 was not submitted
Efficacy data was not submitted
- Contacted registrant on 09/20 for the following deficiencies:
 - Certification: should be selective method, not cite-all.
 - Formulators and CSF: the source reg. number is incompleteAccording to the registrant, this reg # was submitted a week earlier, refer to the cover letter for his explanation
Registrant sent certification on: 09/21/10
- Contacted registrant on 09/21 for study deficiencies (refer to email)
Study 02: Confidential markings on page 6, 60
Study 03: illegibility on pages 11, 149, 187, 224, 348, 415. Page 296 is missing.
Corrections sent: 09/28/10. Studies now pass 86-5 Review
Jacket Failed: left for PM to decide if the guidelines submitted are sufficient to support this product.
JB 09/28

MRID: 482239

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses **even if a product is currently registered** by consulting the inert Web

site [link to <http://www.epa.gov/oppr001/inerts/lists.html>] and if the inert is not approved, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to http://www.epa.gov/oppbppd1/biopesticides/contacts_bppd.htm].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to <http://www.epa.gov/oppr001/inerts/tips.pdf>] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

Script for Rejection Phone calls

Contact Name: Frank Sobotka
Phone #: 215-497-9501
Email:

First Call/Initials:

Date: 09/20/10
Time: 12:00

Second Call/Initials:

Date:
Time:

This is _____, EPA contractor.

I'm calling regarding your submission in support of

83100-E1 Rotam Methomyl 90SP Insecticide.

83100-ET Rotam Methomyl 29LV Insecticide.

We have found the following deficiencies regarding:

PR Notice 86.5: Yes or No

Volume/Study Title:

482261 ✓ passed
(ET) 482239

→ 02: VI (pg 6, 60)

→ 03: FR (111, 149, 187, 224, 348, 415)
GR (296)

Volume/Study Title:

Volume/Study Title:

Additional volumes continued on back of page: Yes or No

Application Package: Yes or No

83100-E1 { * certification → section 1 should be selective method
+
83100-ET { * Formulation → registered source reg # incomplete, why?
(is it still unregistered).


These deficiencies have been approved by EPA.

The corrections can be faxed to 703-305-5060/Attn: _____.

Second Call/Email:

If we do not receive the corrections by _____, we will process your submission, accordingly. Please direct all future calls and correspondence to the appropriate EPA Risk Manager.



EPA Submission: Rotam Methomyl 29LV 
Jennifer Brandon to: Frank Sobotka
Cc: Sree Nair

09/21/2010 10:37 AM

Mr. Sobotka,

This is a follow-up email with regard to your submission in support of the registration of the product **Rotam Methomyl 29LV Insecticide (EPA Registration Number: 83100-TBA)**. As I mentioned in our conversation, I am sending the corrections that need to be made to the studies that support this product:

Study 02 (Volume 03): Enforcement Analytical Method, Laboratory ID: RA714201

The Confidential marking on page 6 and 60 of the study contradict the No Claim of Confidentiality on page 2. You can add a supersede statement on page 2 stating that: "This claim of no confidentiality supersedes all subsequent claims of confidentiality found elsewhere in this report." This will override the confidentiality markings.

Study 03 (Volume 04): Determination of Physical and Chemical Properties, Laboratory ID: RA7142(02-15)

Page 296 was omitted from the study.

The following pages in the study are illegible due to the poor quality of the photocopying: 111, 149, 187, 224, 348, and 415.

If you have any questions or require additional information, please do not hesitate to contact me.

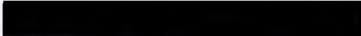
Thanks,

Jennifer Brandon
Data Analyst (EPA Contractor)
2777 S. Crystal Drive
Arlington, VA 22202
Ph: 703-305-0074
Fax: 703-305-5060
Email: brandon.jennifer@epa.gov

Frank Sobotka

Resending, wrong spelling of your name. This o...

09/21/2010 10:14:19 AM

From: Frank Sobotka 
To: <brandon.jennifer@epa.gov>
Date: 09/21/2010 10:14 AM
Subject: FW: Revised Rotam Methomyl 29LV/90SP 8570-34 Form

Personal privacy information

Resending, wrong spelling of your name. This one should get to you.

Dr. Frank E. Sobotka, Senior Partner
IPM Resources LLC
4032 Crockers Lake Blvd.
Suite 818

Sarasota, FL 34238
PH: 215 497-9501
FX: 215 497-9502

Personal privacy information

From: [REDACTED]
To: brandon.gennifer@epa.gov
Subject: Revised Rotam Methomyl 29LV/90SP 8570-34 Form
Date: Tue, 21 Sep 2010 10:05:40 -0400

See attached revised 8570-34 Form for Both Subject Products. Thanks for your assistance.

Dr. Frank E. Sobotka, Senior Partner
IPM Resources LLC
4032 Crockers Lake Blvd.
Suite 818
Sarasota, FL 34238
PH: 215 497-9501
FX: 215 497-9502

[attachment "Rotam Methomyl 29LV 8570-34 form 09_08_10 rev.pdf" deleted by Jennifer
Brandon/DC/USEPA/US] [attachment "Rotam Methomyl 90SP 8570-34 form 09_08_10 rev.pdf" deleted by
Jennifer Brandon/DC/USEPA/US]



RE: EPA Submission: Rotam Methomyl 29LV

Frank Sobotka o Jennifer Brandon

09/21/2010 12:21 PM

History: This message has been replied to.

I am working on the corrections and will be back to you in a day or two. Need to go back to the lab in china for PC page enlargements.

Dr. Frank E. Sobotka, Senior Partner
IPM Resources LLC
4032 Crockers Lake Blvd.
Suite 818
Sarasota, FL 34238
PH: 215 497-9501
FX: 215 497-9502

> Subject: EPA Submission: Rotam Methomyl 29LV

> To: [REDACTED]

> CC: Nair.Sree@epamail.epa.gov

> From: Brandon.Jennifer@epamail.epa.gov

Personal privacy information

> Date: Tue, 21 Sep 2010 10:37:20 -0400

>

> Mr. Sobotka,

>

> This is a follow- up email with regard to your submission in support of
> the registration of the product Rotam Methomyl 29LV Insecticide (EPA
> Registration Number: 83100-TBA).

> As I mentioned in our conversation, I am sending the corrections that
> need to be made to the studies that support this product:

>

> Study 02 (Volume 03): Enforcement Analytical Method, Laboratory ID:
> RA714201

>

> The Confidential marking on page 6 and 60 of the study contradict the
> No Claim of Confidentiality on page 2. You can add a supersede
> statement on page 2 stating that: "This claim of no confidentiality
> supersedes all subsequent claims of confidentiality found elsewhere
> in this report." This will override the confidentiality markings.

>

> Study 03 (Volume 04): Determination of Physical and Chemical
> Properties, Laboratory ID: RA7142(02-15)

>

> Page 296 was omitted from the study.

> The following pages in the study are illegible due to the poor
> quality of the photocopying: 111, 149, 187, 224, 348, and 415.

>

> If you have any questions or require additional information, please do
> not hesitate to contact me.

>

> Thanks,
>
> Jennifer Brandon
> Data Analyst (EPA Contractor)
> 2777 S. Crystal Drive
> Arlington, VA 22202
> Ph: 703-305-0074
> Fax: 703-305-5060
> Email: brandon.jennifer@epa.gov
>
>
>
>
>

> From: Frank Sobotka [REDACTED]
>
> To: <brandon.jennifer@epa.gov>
>

Personal privacy information

> Date: 09/21/2010 10:14 AM
>
> Subject: FW: Revised Rotam Methomyl 29LV/90SP 8570-34 Form
>
>
>
>
>
>
>

> Resending, wrong spelling of your name. This one should get to you.
>
>

> Dr. Frank E. Sobotka, Senior Partner
> IPM Resources LLC
> 4032 Crockers Lake Blvd.
> Suite 818
> Sarasota, FL 34238
> PH: 215 497-9501
> FX: 215 497-9502
>
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>
>

Personal privacy information

> From: [REDACTED]
> To: brandon.gennifer@epa.gov
> Subject: Revised Rotam Methomyl 29LV/90SP 8570-34 Form
> Date: Tue, 21 Sep 2010 10:05:40 -0400
>

> See attached revised 8570-34 Form for Both Subject Products. Thanks for
> your assistance.
>
>

> Dr. Frank E. Sobotka, Senior Partner
> IPM Resources LLC
> 4032 Crockers Lake Blvd.
> Suite 818
> Sarasota, FL 34238
> PH: 215 497-9501
> FX: 215 497-9502



RE: EPA Submission: Rotam Methomyl 29LV

Frank Sobotka o Jennifer Brandon

09/27/2010 10:22 AM

See attached missing page and revised Confidentiality Statement page as requested. I am still working with China on the other non-readable pages. Allow me a day or two more and I should have the revised pages. Seems their in the middle of Autumn Festival, a Chinese Holiday, and things are taking longer than usual. Sorry for the delay.

Dr. Frank E. Sobotka, Senior Partner
IPM Resources LLC
4032 Crockers Lake Blvd.
Suite 818
Sarasota, FL 34238
PH: 215 497-9501
FX: 215 497-9502

> Subject: EPA Submission: Rotam Methomyl 29LV

> To: [REDACTED]

Personal privacy information

> From: Brandon.Jennifer@epamail.epa.gov

> Date: Thu, 23 Sep 2010 15:39:06 -0400

>

> Mr. Sobotka,

>

> I will be out of the office tomorrow, 09/24/10. You can sent the

> remaining corrections on Monday,

>

> Sorry for any inconvenience,

>

>

> Jennifer Brandon

> Data Analyst (EPA Contractor)

> 2777 S. Crystal Drive

> Arlington, VA 22202

> Ph: 703-305-0074

> Fax: 703-305-5060

> Email: brandon.jennifer@epa.gov

>

>

>

>

> From: Frank Sobotka [REDACTED]

Personal privacy information

>

> To: Jennifer Brandon/DC/USEPA/US@EPA

>

> Date: 09/21/2010 12:21 PM

>

> Subject: RE: EPA Submission: Rotam Methomyl 29LV

>

>
>
>
>
>
> I am working on the corrections and will be back to you in a day or two.
> Need to go back to the lab in china for PC page enlargements.

>
> Dr. Frank E. Sobotka, Senior Partner
> IPM Resources LLC
> 4032 Crockers Lake Blvd.
> Suite 818
> Sarasota, FL 34238
> PH: 215 497-9501
> FX: 215 497-9502

>
>
>
>
>
>
>
>
> > Subject: EPA Submission: Rotam Methomyl 29LV
> > To: [REDACTED]
> > CC: Nair.Sree@epamail.epa.gov
> > From: Brandon.Jennifer@epamail.epa.gov
> > Date: Tue, 21 Sep 2010 10:37:20 -0400

Personal privacy information

>
> > Mr. Sobotka,
>
> > This is a follow- up email with regard to your submission in support
> of
> > the registration of the product Rotam Methomyl 29LV Insecticide (EPA
> > Registration Number: 83100-TBA).
> > As I mentioned in our conversation, I am sending the corrections that
> > need to be made to the studies that support this product:
> >
> > Study 02 (Volume 03): Enforcement Analytical Method, Laboratory ID:
> > RA714201
> >
> > The Confidential marking on page 6 and 60 of the study contradict the
> > No Claim of Confidentiality on page 2. You can add a supersede
> > statement on page 2 stating that: "This claim of no confidentiality
> > supersedes all subsequent claims of confidentiality found elsewhere
> > in this report." This will override the confidentiality markings.
> >
> > Study 03 (Volume 04): Determination of Physical and Chemical
> > Properties, Laboratory ID: RA7142(02-15)
> >
> > Page 296 was omitted from the study.
> > The following pages in the study are illegible due to the poor
> > quality of the photocopying: 111, 149, 187, 224, 348, and 415.
> >
> > If you have any questions or require additional information, please do
> > not hesitate to contact me.
> >
> > Thanks,
> >
> > Jennifer Brandon



RE: EPA Submission: Rotam Methomyl 29LV

Frank Sobotka o Jennifer Brandon
:

09/28/2010 09:36 AM

Attached please find the corrected non-readable pages. To properly correct the issue I had to add one page to each non-readable pages as an extension A of the page number.
Again sorry for the delay.

Dr. Frank E. Sobotka, Senior Partner
IPM Resources LLC
4032 Crockers Lake Blvd.
Suite 818
Sarasota, FL 34238
PH: 215 497-9501
FX: 215 497-9502

Personal privacy information

From: [REDACTED]
To: brandon.jennifer@epamail.epa.gov
Subject: RE: EPA Submission: Rotam Methomyl 29LV
Date: Mon, 27 Sep 2010 10:21:51 -0400

See attached missing page and revised Confidentiality Statement page as requested. I am still working with China on the other non-readable pages. Allow me a day or two more and I should have the revised pages. Seems their in the middle of Autumn Festival, a Chinese Holiday, and things are taking longer than usual. Sorry for the delay.

Dr. Frank E. Sobotka, Senior Partner
IPM Resources LLC
4032 Crockers Lake Blvd.
Suite 818
Sarasota, FL 34238
PH: 215 497-9501
FX: 215 497-9502

> Subject: EPA Submission: Rotam Methomyl 29LV
> To: [REDACTED]
> From: Brandon.Jennifer@epamail.epa.gov
> Date: Thu, 23 Sep 2010 15:39:06 -0400

Personal privacy information

>
> Mr. Sobotka,
>
> I will be out of the office tomorrow, 09/24/10. You can sent the



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 15, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OPP Decision Number: D-439798
EPA File Symbol or Registration Number: 83100-EI
Product Name: ROTAM METHOMYL 90SP INSECTICIDE
EPA Receipt Date: 14-Sep-2010
EPA Company Number: 83100
Company Name: ROTAM AGROCHEMICAL COMPANY LIMITED

FRANK E. SOBOTKA, PH.D.
IPM RESOURCES LLC
ROTAM AGROCHEMICAL COMPANY LIMITED
7/F CHEUNG TAT CENTRE
4032 CROCKERS LAKE BLVD., STE 818
SARASOTA, FL 43238-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

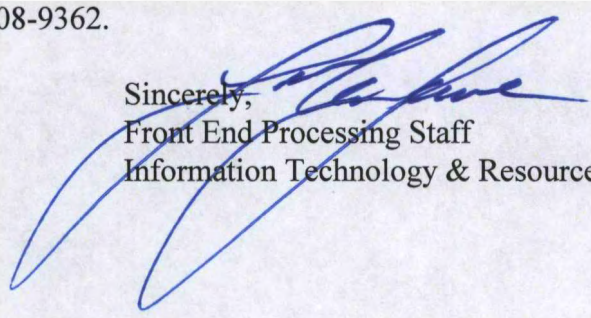
The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R310

NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT
CHEMISTRY;ACUTE TOXICITY;PUBLIC HEALTH PEST EFFICACY);

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee
Ombudsman at (703) 308-9362.

Sincerely,

Front End Processing Staff
Information Technology & Resources Management Division

Fee for Service

M
{882202m~

This package includes the following

☒ New Registration

☐ Amendment

☒ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

☐ AD

☐ BPPD

☒ RD

Risk Mgr. 7

Receipt No.

S-

882202

EPA File Symbol/Reg. No.

83100-EI

Pin-Punch Date:

9/14/2010

☐ This item is NOT subject to FFS action.

Action Code:

Requested: R-310

Granted: R-310

Amount Due: \$ _____

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: *Venus Gager*

Date: *9/15/10*

Remarks:

formulator's exemption incomplete

Receipt for Section 3

S: 862202

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☒ Yes ☐ No

Application Type: New Registration

Billable: ☒ Yes ☐ No

Company: 83100 ROTAM AGROCHEMICAL COMPANY LIMITED V

Risk Manager: Registration Division, Risk Management Team 7

Product #: 83108-EI Product Name: ROTAM METHOMYL 90SP INSECTICIDE

Override#:

Me Too Section3: 352-342 Me Too Product Name: DUPONT LANNATE SP INSECTICIDE

Application Date: 08-Sep-2010 i.i. OPP Rec'd Date: 14-Sep-2010 i.i.

Front End Date: 15-Sep-2010 i.i. Risk Manager Send Date:

FFS Due Date: Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ New Ingredient: ☐

Receipt Description:

New registration

New Ingredient:

Request Date:

New Ingredient:

Received Date:

Form A: ☐ Signature Date:

Form B: ☐ Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Study

CSF

View/Edit

FEE FOR SERVICE

Pay.Gov Payment Confirmation

From: **paygovadmin@mail.doc.twai.gov**

Sent: Fri 9/10/10 9:19 AM

To: [REDACTED]

Personal privacy information

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

Your transaction has been successfully completed.

Transaction Summary

Application Name: PRIA Service Fees

Pay.gov Tracking ID: 251ERTGN

Agency Tracking ID: 74137335321

Name On Account: IPM Resources LLC

Transaction Type: ACH Debit

Transaction Amount: \$3,213.00

Payment Date: Sep 13, 2010

Account Type: Business Checking

Routing Number: 031000503

Account Number: *****9541

Transaction Date: Sep 10, 2010 9:19:04 AM

Number of Payments Scheduled: 1

Frequency: OneTime

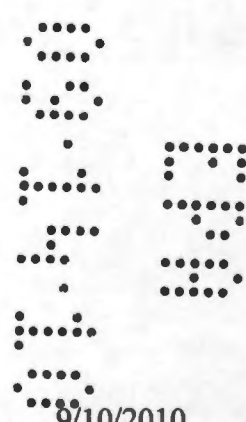
Decision Number:

Registration Number:

Company Name: Rotam Agrochemical Compan

Company Number: 83100

Action Code: R3100



Dr. Frank Sobotka@IPMR

From: <Jamula.John@epamail.epa.gov>
Date: Tuesday, April 20, 2010 3:05 PM
To: [REDACTED]
Subject: Unused PRIA Payment

Personal privacy information

I was checking our records and found one payment from Rotam Agrochemical that has not been applied to any actions. Please feel free to reference this the next time that you submit an action. If the fee associated with the action is more than either of these payments, just pay the difference and include copies of both receipts.... JJ>

Amount Pay.Gov ID
83100 ROTAM AGROCHEMICAL COMPANY LIM 1365.00 24V2OBCS 11/06/08

4578
1365

\$ 3,213.00

4/20/2010

IPM *Resources LLC*

4032 Crockers Lake Blvd., Suite 818, Sarasota, FL 34238 Phone: (215) 497-9501 Fax: (215) 497-9502

"an intellectual property management resource company"

September 10, 2010

VIA UPS EXPRESS

hebert.john@epa.gov

[REF. # 1 -703-308-6249]

Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501
ATTN: John Hebert PM 7

SUBJECT: Application for Registration - Rotam Methomyl 90SP Insecticide
EPA File Symbol 83100 - E I

Dear Mr. Hebert :

The purpose of this letter is to transmit to the Agency on behalf of ROTAM AGROCHEMICAL COMPANY LTD. a "Me Too" application to register Rotam Methomyl 90SP Insecticide. This product is similar or identical in composition and labeling to DuPont Lannate SP (EPA Reg. No. 352-342).

All data to support this registration are included in this submission, or cited using cite-all method of data support, except for two Group B Physical/Chemical Property studies, Storage Stability and Corrosion Characteristics. These two studies will be conducted and a report sent to the Agency upon completion.

This End Use Product will be formulated using Rotam Methomyl Technical. A Formulator's Exemption Statement has been included in this submission. Please note that an application to support registration of Rotam Methomyl Technical was submitted approximately one week earlier.

**SUBJECT: Application for Registration - Rotam Methomyl 90SP Insecticide/
Continued EPA File Symbol 83100 - To be Added**

The following are enclosed in this submission:

Administrative Materials: (MRID No.: _____)

- Transmittal Form (EPA Form 8570-1)
- PRIA Prepay Receipt
- Certification With Respect to Citation of Data (EPA Form 8570-34)
- Data Matrix (EPA Form 8570-35) w/Redacted version
- Formulator's Exemption Statement (EPA Form 8570-27)
- Confidential Statement of Formula (EPA Form 8570-4), 2 Extra Copies
- Draft Labeling Rotam Methomyl 90SP Insecticide, 5 Copies
- Three copies each of the following:

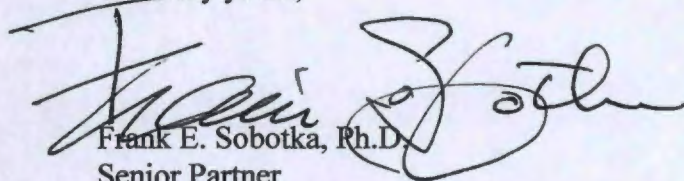
VOLUME NO.	DESCRIPTION	OPPTS GUIDELINE REF. NO.	MRID NO.
1-R	Product Identity & Disclosure of Ingredients, Including Manufacturing Process & Discussion of Formation of Impurities/Rotam Methomyl 90SP Insecticide [Report No.: METHMYL 90SP]	Group A 830.1550 830.1600 830.1650 830.1670	
2	VOLUME 2 NOT SUBMITTED		
3	Enforcement Analytical Method (Active Ingredient Content)/ Rotam Methomyl 90SP Insecticide[Report No.:SOP20458-III]	830.1800	

**SUBJECT: Application for Registration - Rotam Methomyl 90SP Insecticide/
Continued EPA File Symbol 83100 - To be Added**

4	Determination of Physical and Chemical Properties of Rotam Methomyl 90SP Insecticide [Report No.: 22381]	Group B 830.6302 830.6303 830.6304 830.6313 830.6314 830.7000 830.7050	
5	THIS VOLUME 5 NOT SUBMITTED		
6	Acute Toxicology Studies Rotam Methomyl 90SP Insecticide [Report No.: 2918 to 2923]	870.1100 870.1200 870.1300 870.2400 870.2500 870.2600	

We appreciate your assistance with this Application. If you have any questions or need additional information, please do not hesitate to contact us at any time.

Sincerely yours,


Frank E. Sobotka, Ph.D.
Senior Partner
IPM Resources LLC (Agent)

ATT:



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Rotam Agrochemical Company Ltd / 83100 -EI	2. EPA Product Manager John Hebert	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) Rotam Methomyl 90SP Insecticide	PM# 7	
5. Name and Address of Applicant (Include ZIP Code) ROTAM Agrochemical Company Limited C/O IPM Resources LLC (Agent) 4032 Crockers Lake Blvd., Suite 818 Sarasota, FL 34238 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 352-342 Product Name DuPont Lannate SP	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of request for Registration and Service Fee (PRIA-2003) verification.

New "me-too" End-use Registration Application (EPA PRIA No.: R310) Formulator's Exemption, Non-fast Track/6 Month Review of Product Chemistry/Acute Tox. Service Fee: \$4,578. Product: Rotam Methomyl 90SP Insecticide (EPA Reg. No.: 83100- To be Added). Contact: Rotam Agrochemical Company Limited, c/o IPM Resources LLC (Agent), 4032 Crockers Lake Blvd., Suite 818, Sarasota, FL 34238 Email: [REDACTED] Ph: 215 497-9501 FAX: 215 497-9502

Personal privacy information

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt. 24/12/10 lb bag	No. per container 24/6/4 /case	If "Yes" Package wgt 0.5/2/5 lbs/bag	No. per container 1/1/2 /bag
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product Printed or glued		<input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Frank E. Sobotka, Ph.D.		Title Agent	
		Telephone No. (Include Area Code) 215 497-9501	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			8. Date Application Received (Stamped)
2. Signature 		3. Title Agent	
4. Typed Name Frank E. Sobotka, Ph.D.		5. Date September 08, 2010	



United States
Environmental Protection Agency
Washington, DC 20460

Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address

ROTAM AGROCHEMICAL COMPANY LIMITED
C/O IPM Resources LLC
4032 Crockers Lake Blvd.
Suite 818
Sarasota, FL 34238

EPA File Symbol/Registration Number

83100 - To be Added

Product Name

Rotam Methomyl 90SP Insecticide

Date of Confidential Statement of Formula (EPA Form 8570-4)

November 09, 2009

As an authorized representative of the applicant for registration of the product identified above, I certify that:

- (1) This product contains the following active ingredient(s):

METHOMYL

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

- (3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

- (4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
METHOMYL	[REDACTED]	[REDACTED]
Product ingredient source information may be entitled to confidential treatment		
<div style="text-align: right;"> </div>		
Signature 	Name and Title Frank E. Sobotka, Ph.D. (Agent)	Date 11/10/09

EPA Form 8570-27 (Rev. 8-95)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Rotam Agrochemical Company Ltd., c/o IPM Resources LLC (Agent), 950 Newtown-Yardley Rd., Ste 105 Newtown, PA 18940 215 497-9501	EPA Registration Number/File Symbol 83100 - TBA
Active Ingredient(s) and/or representative test compound(s) METHOMYL	Date September 08, 2010
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) TERRESTRIAL FOOD CROP	Product Name ROTAM METHOMYL 90SP INSECTICIDE

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

SECTION II: GENERAL OFFER TO PAY

(Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements)

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 09/08/2010 rev	Typed or Printed Name and Title Frank E. Sobotka, Ph.D. (Agent)
---------------	------------------------	--

R 310

End Use (EP) or Manufacturing Use (MP) product or Technical Grade of the Active Ingredient (TGA). Must submit Group A and B product chemistry data for each proposed product unless it's a 100% identical (repack): YES or NO (circle one)

Guideline No.	Group A: Product Chemistry Data Study Title	EP Data Submitted		MP Data Submitted		TGA	
		Yes	No	Yes	No	Yes	No
830.1550	Product Identity & Composition	✓					
830.1600	Description of materials used to produce the product	✓					
830.1650	Description of formulation process	✓					
830.1670	Discussion on the formation of impurities	✓					
830.1700	Preliminary analysis		✓				
830.1750	Certified limits (158.345) (CSF)	✓					
830.1800	Enforcement analytical method	✓					

Guideline No.	Group B: Product Chemistry Data Study Title	EP Data Submitted		MP Data Submitted		TGA	
		Yes	No	Yes	No	Yes	No
830.6302	Color	✓					
830.6303	Physical State	✓					
830.6304	Odor	✓					
830.6313	Stability to normal and elevated temperatures metal and metal ions						
830.6314	Oxidation/Reduction (Chemical incompatibility)	✓					
* 830.6315	Flammability		✓				
* 830.6316	Explosibility		✓				
830.6317	Storage stability	✓					
* 830.6319	Miscibility		✓				
* 830.6320	Corrosion Characteristics		✓				
* 830.6321	Dielectric Breakdown Voltage		✓				
830.7000	pH	✓					
830.7050	UV/ Visible Absorption						
* 830.7100	Viscosity		✓				
830.7200	Melting Point						
830.7220	Boiling Point						
830.7300	Density (listed as 830.7050 in data matrix)	✓					
830.7370	Dissociation Constant						
830.7550	Partition Coefficient						
830.7840	Water Solubility						
830.7950	Vapor Pressure						

Grayed out = data not required

* see data matrix footnote

* registrant states that this product properties are such that none of these guidelines apply to the product.

R 310

New products must either: 1) supply the product specific acute toxicity 6 pack data (listed below), or 2) provide a bridging rationale document. The bridging document directs OPP to use a currently registered set of 6 acute toxicity data and label; instead of submitting product specific data.

Guideline No.	Acute toxicity (6 pack) Study Title	Data submitted		Cited	
		Yes	No	Yes	No
870.1100	Acute Oral (LD50)	✓			
870.1200	Acute Dermal (LD50)	✓			
870.1300	Acute Inhalation (LC50)	✓			
870.2400	Acute Eye Irritation	✓			
870.2500	Acute Dermal Irritation	✓			
870.2600	Dermal Sensitization	✓			

Efficacy – which guideline is used depends on the proposed label use NOT submitted

Guideline No.	Study Title	Data submitted		Cited		Comments
		Yes	No	Yes	No	
810.3100	Soil Treatments for Imported Fire Ants		✓		✓	
810.3200	Livestock, Poultry, Fur and Wool-Bearing Animal Treatments		✓		✓	
810.3300	Treatments to Control Pests of Humans and Pets		✓		✓	
810.3400	Mosquito, Black Fly, and Biting Midge (Sand Fly) Treatments		✓		✓	
810.3500	Premises Treatments		✓		✓	
810.3600	Structural Treatments		✓		✓	
810.3800	Methods for Efficacy Testing of Termite Baits		✓		✓	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M STREET, S.W.
WASHINGTON, D.C. 20460

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Date September 08, 2010

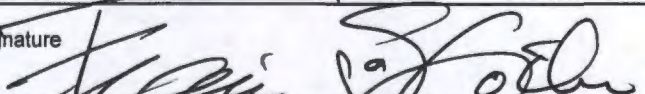
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Applicant's/Registrant's Name & Address ROTAM AGROCHEMICAL COMPANY LIMITED
 C/O IPM Resources LLC (Agent)
 4032 Crockers Lake Blvd., Suite 818
 Sarasota, FL 34238

Product
 ROTAM METHOMYL 90SP INSECTICIDE

Ingredient METHOMYL

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Group A - Product Identity, Composition and Analysis Test Guidelines					
830.1550	Product Identity Composition		ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 1; CSF 11/09/09
830.1600	Description of Materials		ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 1
830.1650	Description of Formulation Process		ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 1
830.1670	Discussion of Formation of Impurities		ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 1
830.1700	Preliminary Analysis			NA	
830.1750	Certified Limits		ROTAM AGROCHEMICAL COMPANY LTD	OWN	CSF 11/09/09
830.1800	Enforcement Analytical Methods		ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 3
830.1900	Submittal of Samples			NA	
Group B - Physical/Chemical Properties Test Guidelines					
830.6302	Color		ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 4
830.6303	Physical State		ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 4
830.6304	Odor		ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 4
Signature	Name and Title			Date	
	Fran E. Sobotka, Ph.D. Agent			09/08/2010	

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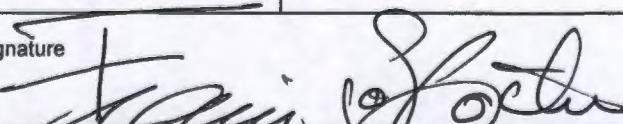
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 ROTAM AGROCHEMICAL COMPANY LIMITED
 C/O IPM Resources LLC (Agent)
 4032 Crockers Lake Blvd., Suite 818
 Sarasota, FL 34238

Product
 ROTAM METHOMYL 90SP INSECTICIDE

Ingredient METHOMYL

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Group B - Physical/Chemical Properties Test Guidelines (Continued)					
830.6313	Stability		ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 4
830.6314	Oxidization/Reduction		ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 4
830.6315	Flammability			NA	Footnote 1
830.6316	Explosibility			NA	Footnote 2
830.6317	Storage Stability			NA	Footnote 3
830.6318	Viscosity			NA	Footnote 4
830.6319	Miscibility			NA	Footnote 4
830.6320	Corrosion Characteristics			NA	Footnote 3
830.6321	Dielectric Breakdown Voltage			NA	Footnote 5
830.7000	pH		ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 4
830.7050	Density/Relative Density		ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 4
Signature 			Name and Title Frank E. Sobotka, Ph.D. Agent		Date 09/08/2010

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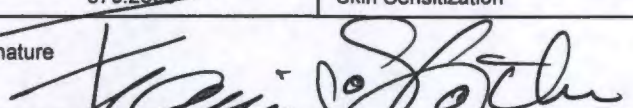
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C/O IPM Resources LLC (Agent)
4032 Crockers Lake Blvd., Suite 818
Sarasota, FL 34238

Product
ROTAM METHOMYL 90SP INSECTICIDE

Ingredient METHOMYL

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Group A - Acute Toxicity Test Guidelines					
870.1100	Acute Oral Toxicity - Rat		ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 6
870.1200	Acute Dermal Toxicity - Rat		ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 6
870.1300	Acute Inhalation Toxicity - Rat		ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 6
870.2400	Acute Eye Irritation - Rabbit		ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 6
870.2500	Acute Dermal Irritation - Rabbit		ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 6
870.2600	Skin Sensitization		ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 6
Signature 			Name and Title Frank E. Sobotka, Ph.D. Agent	Date 09/08/2010	

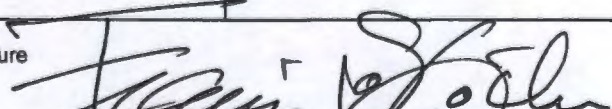
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Applicant's/Registrant's Name & Address	ROTAM LTD C/O IPM Resources LLC (Agent) 4032 Crockers Lake Blvd., Suite 818 Sarasota, FL 34238	Product	ROTAM METHOMYL 90SP INSECTICIDE	

Ingredient METHOMYL

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	Generic Data [FORMULATOR'S EXEMPTION]	CITE - ALL	E. I. DU PONT DE NEMOURS AND CO., INC. DUPONT CROP PROTECTION (S300/427) PO BOX 30 NEWARK, DE 19714-0030	PAY	
			BAYER CROPS SCIENCE LP 2 T.W. ALEXANDER DRIVE RESEARCH TRIANGLE PARK, NC 27709		
			FARNAM COMPANIES INC D/B/A CENTRAL LIFE SCIENCES 301 WEST OSBORN ROAD PHOENIX, AZ 85013		
			WELLMARK INTERNATIONAL 1501 E. WOODFIELD ROAD SUITE 200 WEST SCHAUMBURG, IL 60173		
			DENKA INTERNATIONAL 4 TAR ROCK ROAD WESTPORT, CT 06880		
			BURLINGTON SCIENTIFIC CORPORATION 71 CAROLYN BLVD FARMINGDALE, NY 11735		
			SPRAY DRIFT TASK FORCE MCKENNA, LONG & ALDRIDGE LLP 1900 K STREET, NW WASHINGTON, DC 20006		
			AGRICULTURAL REENTRY TASK FORCE 1350 I STREET, N.W. WASHINGTON, DC 20005		
Signature				Name and Title	Frank E. Sobotka, Ph.D. Agent
				Date	09/08/2010

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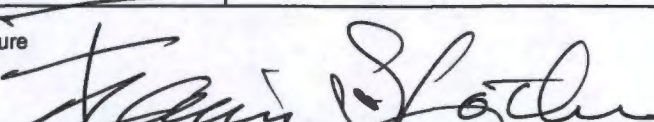
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 ROTAM LTD
 C/O IPM Resources LLC (Agent)
 4032 Crockers Lake Blvd., Suite 818
 Sarasota, FL 34238

Product
 ROTAM METHOMYL 90SP INSECTICIDE

Ingredient METHOMYL

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	Generic Data [FORMULATOR'S EXEMPTION]	CITE - ALL	TROY BIOSCIENCES INCORPORATED C/O TROY CORPORATION 8 VREELAND ROAD FLORHAM PARK, NJ 07932	PAY	
			GLADES FORMULATING CORP 30856 ROCKY ROAD GREELEY, CO 80631-9375		
			AGRICULTURAL HANDLERS EXPOSURE TASK FORCE PO BOX 509 MACON, MO 63552		
			FIFRA ENDANGERED SPECIES TASK FORCE, L C/O HAROLD HIMMELMAN (BEVERIDGE & DIAMOND) 1350 I STREET, NW WASHINGTON, DC 20005		
			RESIDENTIAL EXPOSURE JOINT VENTURE 900 17TH STREET, NW, SUITE 300 WASHINGTON, DC 20006		
			NOVARTIS ANIMAL HEALTH US, INC. 3200 NORTHLINE AVENUE, SUITE 300 GREENSBORO, NC 27408		
Signature			Name and Title	Frank E. Sobotka, Ph.D. Agent	Date 09/08/2010

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C/O IPM Resources LLC
4032 Crockers Lake Blvd., Suite 818
Sarasota, FL 34238

Product

ROTAM METHOMYL 90SP INSECTICIDE

Ingredient METHOMYL

FOOTNOTES:

1. Contains no flammable ingredients
2. Not potentially explosive.
3. One year Commercial Stability (830.6317) and Corrosion Characteristics (830.6320) will be conducted and a report sent to the USEPA upon completion.
4. Product is a solid.
5. Not registered for use around electrical power boxes

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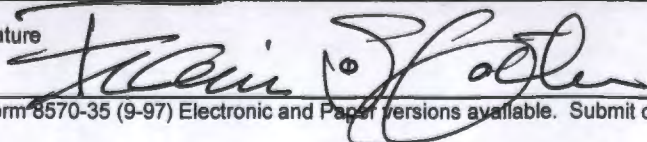
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Ingredient METHOMYL

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			ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 1
			ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 1
				NA	
			ROTAM AGROCHEMICAL COMPANY LTD	OWN	CSF 11/09/09
			ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 3
				NA	
			ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 4
			ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 4
			ROTAM AGROCHEMICAL COMPANY LTD	OWN	See Volume 4

Signature



Name and Title Frank E. Sobotka, Ph.D. Agent

Date
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ROTAM METHOMYL 90SP INSECTICIDE

Ingredient METHOMYL

Guideline Reference Number

Guideline Study Name

MRID Number

Submitter

Status

Note

ROTAM AGROCHEMICAL COMPANY LTD

OWN

See Volume 4

ROTAM AGROCHEMICAL COMPANY LTD

OWN

See Volume 4

NA

Footnote 1

NA

Footnote 2

NA

Footnote 3

NA

Footnote 4

NA

Footnote 4

NA

Footnote 3

NA

Footnote 5

ROTAM AGROCHEMICAL COMPANY LTD

OWN

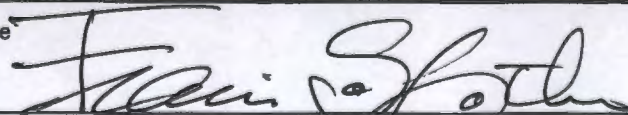
See Volume 4

ROTAM AGROCHEMICAL COMPANY LTD

OWN

See Volume 4

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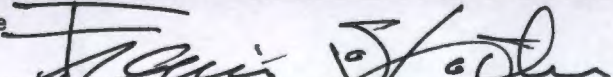
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Ingredient METHOMYL

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Ingredient METHOMYL

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			E. I. DU PONT DE NEMOURS AND CO., INC. DUPONT CROP PROTECTION (S300/427) PO BOX 30 NEWARK, DE 19714-0030	PAY	
			BAYER CROPS SCIENCE LP 2 T.W. ALEXANDER DRIVE RESEARCH TRIANGLE PARK, NC 27709		
			FARNAM COMPANIES INC D/B/A CENTRAL LIFE SCIENCES 301 WEST OSBORN ROAD PHOENIX, AZ 85013		
			WELLMARK INTERNATIONAL 1501 E. WOODFIELD ROAD SUITE 200 WEST SCHAUMBURG, IL 60173		
			DENKA INTERNATIONAL 4 TAR ROCK ROAD WESTPORT, CT 06880		
			BURLINGTON SCIENTIFIC CORPORATION 71 CAROLYN BLVD FARMINGDALE, NY 11735		
			SPRAY DRIFT TASK FORCE MCKENNA, LONG & ALDRIDGE LLP 1900 K STREET, NW WASHINGTON, DC 20006		
			AGRICULTURAL REENTRY TASK FORCE 1350 I STREET, N.W. WASHINGTON, DC 20005		

Signature		Name and Title	Frank E. Sobotka, Ph.D. Agent	Date	09/08/2010
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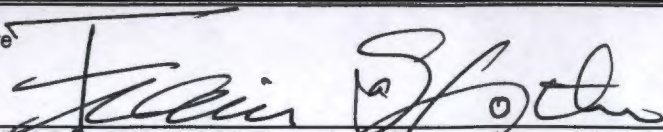
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 C/O IPM Resources LLC (Agent)
 4032 Crockers Lake Blvd., Suite 818
 Sarasota, FL 34238

Product
 ROTAM METHOMYL 90SP INSECTICIDE

Ingredient METHOMYL

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			TROY BIOSCIENCES INCORPORATED C/O TROY CORPORATION 8 VREELAND ROAD FLORHAM PARK, NJ 07932	PAY	
			GLADES FORMULATING CORP 30856 ROCKY ROAD GREELEY, CO 80631-9375		
			AGRICULTURAL HANDLERS EXPOSURE TASK FORCE PO BOX 509 MACON, MO 63552		
			FIFRA ENDANGERED SPECIES TASK FORCE, L C/O HAROLD HIMMELMAN (BEVERIDGE & DIAMOND) 1350 I STREET, NW WASHINGTON, DC 20005		
			RESIDENTIAL EXPOSURE JOINT VENTURE 900 17TH STREET, NW, SUITE 300 WASHINGTON, DC 20006		
			NOVARTIS ANIMAL HEALTH US, INC. 3200 NORTHLINE AVENUE, SUITE 300 GREENSBORO, NC 27408		

Signature



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C/O IPM Resources LLC
4032 Crockers Lake Blvd., Suite 818
Sarasota, FL 34238

Product

ROTAM METHOMYL 90SP INSECTICIDE

Ingredient METHOMYL

RESTRICTED USE PESTICIDE

Due to High Acute Toxicity to Humans

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

GROUP

1A

INSECTICIDE

Rotam Methomyl 90SP Insecticide *In Water Soluble Packets*

Active Ingredient

Methomyl

(S-methyl-N-[(methylcarbamoyl)
oxy]thioacetimidate) 90%

Inert Ingredients 10%

TOTAL 100%

EPA Reg. No. 83100 - TBA

EPA Est. No.: TBA

KEEP OUT OF REACH OF CHILDREN
DANGER POISON



PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See additional Precautionary Statements on inside booklet and back panel of container and Directions for Use on inside booklet.

Manufactured by:
Rotam Agrochemical Company Ltd.
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong
1-866-927-6826

Net Contents:
Packets/Container

RESTRICTED USE PESTICIDE**Due to High Acute Toxicity to Humans**

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

GROUP**1A****INSECTICIDE**

Rotam Methomyl 90SP Insecticide
In Water Soluble Packets

KEEP OUT OF REACH OF CHILDREN
DANGER POISON

**PELIGRO**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID**(N-Methyl Carbamate insecticide)**

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

ATROPINE IS AN ANTIDOTE. SEEK MEDICAL ATTENTION AT ONCE IN ALL CASES OF SUSPECTED POISONING.

If poisoning symptoms appear (see POISONING SYMPTOMS), get medical attention. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. FATAL IF SWALLOWED. MAY BE FATAL IF INHALED OR GETS IN EYES. DO NOT BREATHE DUST OR SPRAY MIST.

Do not get in eyes or on clothing. Wear protective eyewear and respirator.

Harmful if absorbed through skin. Avoid contact with skin. Wash hands thoroughly with soap and water after handling.

POISONING SYMPTOMS: Methomyl poisoning produces effects associated with anticholinesterase activity which may include weakness, blurred vision, headache, nausea, abdominal cramps, discomfort in the chest, constriction of pupils, sweating, slow pulse, muscle tremors. If poisoning symptoms appear, refer to First Aid section on the ROTAM METHOMYL 90SP label and seek medical attention at once.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

TREATMENT: Atropine sulfate should be used for treatment. Administer repeated doses, 1.2 to 2.0 mg. intravenously every 10 to 30 minutes until full atropinization is achieved. Maintain atropinization until the patient recovers. Artificial respiration or oxygen may be necessary. Allow no further exposure to any cholinesterase inhibitor until recovery is assured.

Do not use 2-PAM for exposure to ROTAM METHOMYL 90SP alone. However, for exposure to combinations of ROTAM METHOMYL 90SP and organophosphorous insecticides, 2-PAM may be used as required to supplement the atropine sulfate treatment. Do not use morphine.

Refer to inside label booklet for additional precautionary information including Personal Protective Equipment (PPE), User Safety Recommendations, Engineering Controls Statements, Environmental Hazards and Directions For Use.

Water Soluble Powder In Water Soluble Bags

Active Ingredient

Methomyl

(S-methyl-N-[(methylcarbamoyl) oxy]thioacetimidate)	90%
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<u>Inert Ingredients</u>	10%
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TOTAL	100%
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EPA Reg. No. 83100 - TBA

EPA Est. No.: TBA

Manufactured by:
Rotam Agrochemical Company Ltd.
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong
1-866-927-6826

Net Contents:
Packets/Container

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PRECAUTIONARY STATEMENTS (Continued)
HAZARDS TO HUMAN AND DOMESTIC ANIMALS
DANGER

PERSONAL PROTECTIVE EQUIPMENT

Applicators and others exposed to the diluted spray solution must wear:

- Long-sleeved shirt and long pants.
- Chemical resistant gloves such as barrier laminate or butyl rubber.
- Shoes plus socks.
- Protective eyewear.

Mixers, loaders, cleaners, repairers of application equipment, and others exposed to the concentrate must wear:

- Long sleeve shirt and long pants.
- Chemical-resistant gloves, such as barrier laminate or butyl rubber.
- Socks and chemical resistant footwear.
- Protective eyewear.
- Respirator as outlined below.
- Chemical resistant apron.

For exposures in enclosed areas, a respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or a canister with any R, P, or HE prefilter.

For exposures outdoors, Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any R, P, or HE prefilter. Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROL STATEMENTS

Human flaggers must be in enclosed cabs.

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR part 170.240 (d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

The enclosed cabs must be used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR part 170.240 (d)(4-6)]. The handler PPE requirements may be reduced or modified as specified in the WPS.

Water soluble packets when used correctly qualify as a closed loading system under the WPS. Handlers handling this product while it is enclosed in intact water-soluble packets are permitted to wear long-sleeved shirt, long pants, shoes plus socks, chemical-resistant gloves, and chemical-resistant apron, provided the other required PPE is immediately available in case the bag is opened.

Pilots must not assist in the mixing and loading operations.

USER SAFETY RECOMMENDATIONS

Users Should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove personal protective equipment immediately after handling this product.
- Wash the outside of gloves before removing.
- As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, and mammals. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high-water mark. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area. This chemical is known to leach through soil into groundwater under certain conditions as a result of label use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

This chemical can contaminate surface water through spray drift. Under some conditions, it may also have a high potential for runoff into surface water for several days to weeks after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, and areas overlaying extremely shallow groundwater, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas over-laying tile drainage systems that drain to surface water.

PHYSICAL AND CHEMICAL HAZARDS

Keep container closed. Use with adequate ventilation.

DIRECTIONS FOR USE **Restricted Use Pesticide**

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI). REI Summary: REI grapes = 7 day; REI peaches = 4 day; REI apple, cotton, grapefruit, lemon, nectarine, orange, tangelo, tangerine = 3 day; all other WPS uses = 48 hour REI.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical Resistant Gloves Category A (such as butyl rubber, natural rubber, neoprene rubber or nitrile rubber), all >14 mils
- Shoes plus socks
- Protective eyewear

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Notify workers of the application to grapes by warning them orally and by posting warning signs at entrances to treated areas.

GENERAL INFORMATION

Chemigation: Overhead sprinkler chemigation is allowed for use in alfalfa, barley, oats, onions, potatoes, rye, sugar beets, and wheat. Refer to supplemental, or Special Local Need (SLN) labeling or the crop specific sections of this label for use directions for chemigation. Do not apply this product through any other type of irrigation systems, except those allowed by instructions provided in a supplemental, SLN or this product label.

Do not formulate this product into other End-use products without written permission from Rotam.

ROTAM METHOMYL 90SP insecticide should be used only in accordance with directions for use on this label or in separate Rotam supplemental labeling. Rotam will not be responsible for use of the product in a manner not specified by Rotam in the product's labeling and User assumes all risk for such use.

ROTAM METHOMYL 90SP is a dry powder to be dissolved in water for application by mechanical ground, overhead sprinkler, or aerial application. Hand-held equipment is prohibited for application to crops.

Do not apply by ground equipment within 25 feet, or by air within 100 feet of lakes, reservoirs, rivers, estuaries, commercial fish ponds and natural, permanent streams, marshes or natural, permanent ponds. Increase the buffer zone to 450 feet from the above aquatic areas when ultra low volume application is made.

Pilots must not assist in the mixing and loading operations.

Use only in commercial and farm plantings. Not for use in home plantings. Not for use during any period after a commercial crop site is opened for public entry as a "U-Pick", "Pick Your Own" or similar operation; in no case shall preharvest applications be made after first public entry. The restricted entry interval and preharvest interval for the crop stated elsewhere on this label must be followed.

SCOUTING

Monitor insect populations to determine whether or not there is a need for application of ROTAM METHOMYL 90SP based on locally determined economic thresholds. More than one treatment of ROTAM METHOMYL 90SP may be required to control a population of pests.

BENEFICIAL ANTHROPODS

ROTAM METHOMYL 90SP at rates of 1/8 to 1/4 lb. per acre helps conserve certain beneficials, including big-eyed bugs, damsel bugs, flower bugs and spiders in cotton and soybeans. While these beneficials cannot be relied upon to control pests, they are of potential value and should be monitored along with pests in pest management programs on these crops.

RESISTANCE MANAGEMENT

For resistance management, ROTAM METHOMYL 90SP insecticide is a group 1A insecticide. Repeated and exclusive use of ROTAM METHOMYL 90SP or other group 1A insecticides may lead to the build-up of resistant strains of insects in some crops. Not all members of this group have been shown to be cross-resistant. Different resistance mechanisms that are not linked to target site of action, such as enhanced metabolism, are common for this group of chemicals. Alternation of compounds from different sub-groups within this group may be an acceptable part of an integrated pest management program.

Some insects are known to develop resistance to products used repeatedly for control. When this occurs, the recommended dosages fail to suppress the pest population below the economic threshold. Because the development of resistance cannot be predicted, the use of this product should conform to resistance management strategies established for the use area. These strategies may include incorporation of cultural and biological control practices, alternation of active classes of insecticides on succeeding generations and targeting the most susceptible life stage. Consult your local or state agricultural authorities for details.

If resistance to this product develops in your area, this product, or other products with a similar mode of action, may not provide adequate control. If poor performance cannot be attributed to improper application or extreme weather conditions, a resistant strain of insect may be present. If you experience difficulty with control and resistance is a reasonable cause, immediately consult your local company representative or agricultural advisor for the best alternative method of control for your area. For additional information on insect resistance monitoring, visit the Insecticide Resistance Action Committee (IRAC) on the web at <http://www.irac-online.org>.

INTEGRATED PEST MANAGEMENT

This product should be used as part of an Integrated Pest Management (IPM) program which can include biological, cultural, and genetic practices aimed at preventing economic pest damage. Application of this product should be based on IPM principles and practices including field scouting or other detection methods, correct target pest identification, population monitoring, and treating

when target pest populations reach locally determined action thresholds. Consult your state cooperative extension service, professional consultants or other qualified authorities to determine appropriate action treatment threshold levels for treating specific pest/crop systems in your area.

SPRAY PREPARATION

Spray equipment must be clean and free of previous pesticide deposits before applying ROTAM METHOMYL 90SP.

Fill spray tank 1/4 to 1/2 full of water. Add ROTAM METHOMYL 90SP directly to spray tank. Carefully open the outer barrier bag containing ROTAM METHOMYL 90SP in a water soluble bag. Do not cut open the outer barrier bag. Invert the outer barrier bag allowing the inner water soluble bag to fall directly into the spray tank. Do not allow packets to become wet prior to adding to the spray tank. Do not handle, open, rip, tear, cut or perforate the inner water soluble bag. Mix thoroughly to fully dissolve the insecticide; once dissolved continued agitation is not required. Use mechanical or hydraulic means; do not use air agitation. Be sure the soluble packet is completely dissolved before adding any other ingredients. Spray mix should not be stored overnight in spray tank.

Compatibility: Since formulations may be changed and new ones introduced, it is recommended that users premix a small quantity of a desired tank mix and observe for possible adverse changes (settling out, flocculation, etc.). Avoid mixtures of several materials and very concentrated spray mixtures.

Do not use ROTAM METHOMYL 90SP with Bordeaux mixture (copper sulfate and hydrated lime), Du Ter triphenyltin hydroxide, lime sulfur, Rayplex iron or in highly alkaline solutions. Use mildly alkaline mixtures immediately after mixing to prevent loss of insecticidal activity.

Tank-mix solutions containing Boron may affect solubility of the water soluble film. When using Boron containing solutions in a tank-mix, follow these procedures:

- Add the correct amount of ROTAM METHOMYL 90SP water soluble packets first
- Be sure the soluble packets are completely dissolved
- Introduce Boron containing solutions last

If the above procedure cannot be followed, and Boron is an essential part of the spray mix, substitute ROTAM METHOMYL LV formulation for the water soluble packets.

Tank Mix Sequence: Add different formulation types in the sequence indicated below. Allow time for complete mixing and dispersion after addition of each product.

1. ROTAM METHOMYL 90SP and other products in water soluble bags.
2. Water dispersible granules
3. Wettable powders
4. Water based suspension concentrates
5. Water soluble concentrates
6. Oil based suspension concentrates
7. Emulsifiable concentrates
8. Adjuvants, surfactants, oils
9. Soluble fertilizers
10. Drift retardants

Follow local practice and manufacturer's recommendation.

APPLICATION

Apply at the recommended rates when insect populations reach locally determined economic thresholds. Consult the cooperative extension service, professional consultants or other qualified authorities to determine appropriate threshold levels for treatment in your area.

Follow-up treatments of ROTAM METHOMYL 90SP should be applied, as needed, to keep pest populations within threshold limits. On most crops, ROTAM METHOMYL 90SP should be applied at 5 to 7 day intervals to maintain control. Refer to crop specific directions for use in the crop tables for more specific information on treatment intervals.

Use sufficient water to obtain thorough, uniform coverage. Since ROTAM METHOMYL 90SP is a fast acting contact insecticide, best results follow direct spraying of the target insect.

For aerial, use a minimum of 2 gals. per acre (gpa) except 10 gpa for grapes, peaches, and nectarines; 15 gpa for oranges, lemons, grapefruit, tangelos and tangerines.

For certain crops a minimum of 1 gallon per acre may be used providing the following conditions are met:

- equipment is adjusted to distribute spray uniformly over the spray swath,
- wind conditions and other factors such as temperature and humidity are such that the spray is delivered to the target area,
- local regulations do not prohibit low-volume aerial sprays,
- use rates are applied as directed on the package label or supplemental labeling for the following crops:

Alfalfa	Celery	Peas (succulent)
Anise	Collards	Peppermint
Asparagus	Corn	Peppers
Barley	Cotton	Potato
Beans	Cucumber	Rye
Broccoli	Lettuce	Soybean
Brussels sprouts		Melons Spinach
Cabbage	Mint	Sugar beet
Carrot	Oats	Summer Squash
Cauliflower	Peanuts	Wheat

Apply the low rates on small plants, small insects and light infestations of insects. Use intermediate rates on large insects and heavier infestations of insects. Use 1 to 3 applications of the highest recommended rate for controlling severe infestations. Thereafter, use the lowest rate possible to maintain control.

SPRAY TANK CLEANOUT

Immediately following application, thoroughly clean all spray equipment to reduce the risk of forming hardened deposits which might become difficult to remove.

Drain spray equipment. Thoroughly rinse sprayer and flush hoses, boom and nozzles with clean water.

Clean all other associated application equipment. Take all necessary safety precautions when cleaning equipment. Do not clean near wells, water sources or desirable vegetation. Dispose of waste rinse water in accordance with local regulations.

CHEMIGATION

Instructions for the Use of ROTAM METHOMYL 90SP on Alfalfa, Barley, Oats, Green and Dry Bulb Onions, Potatoes, Rye, Sugar Beets and Wheat

Using Overhead Sprinkler Chemigation

Overhead chemigation applications offer the advantage of greater penetration and coverage of the target plant. However, typical chemigation applications are more dilute than ground or aerial applications. For best results, it is recommended to keep the concentration of ROTAM METHOMYL 90SP as high as possible in the application. Apply ROTAM METHOMYL 90SP in 0.1 to 0.2 inches of water per acre. ROTAM METHOMYL 90SP is most active as a contact insecticide, although it does also have activity via ingestion of treated plants. For best results, applications of ROTAM METHOMYL 90SP should take place when the insects are active and most likely to come into direct contact with the application.

Types of Irrigation Systems

ROTAM METHOMYL 90SP may be applied through overhead sprinkler irrigation systems for control of various pests. Center pivot and lateral move irrigation systems are preferred. Other overhead sprinkler systems; such as end tow, side (wheel) roll and solid set, may be used if they provide uniform water distribution. Do not use filter screens smaller than 50 mesh throughout the system, due to possible build up of material on 100 mesh or smaller screens. Do not apply ROTAM METHOMYL 90SP through any other type of irrigation systems, except those allowed by instructions provided in a supplemental, SLN, or this product label.

General Directions for Chemigation

Preparation

A pesticide tank is recommended for the application of ROTAM METHOMYL 90SP in chemigation systems. Thoroughly clean the injection system and tank of any fertilizer or chemical residues using a standard clean-out procedure. Dispose of any residues in accordance with State and Federal laws. Add 1/4 to 1/2 of the desired amount of water and then measure the required amount of ROTAM METHOMYL 90SP into the tank. Complete filling the tank by adding the required amount of water. Agitate thoroughly to insure a uniform solution of ROTAM METHOMYL 90SP. Once in solution, no further agitation is required. Injection solution should not be stored overnight. Highly alkaline water should be buffered so that the pH of the spray solution is in the range of neutral to slightly acidic (pH5-7)

Injection into Chemigation Systems

Inject the proper amount of the ROTAM METHOMYL 90SP solution to the irrigation water flow using a positive displacement injection pump. Injection should occur at a point in the main irrigation water flow to ensure thorough mixing with the irrigation water. For continuously moving systems, inject the solution containing ROTAM METHOMYL 90SP into the irrigation water line continually and uniformly throughout the irrigation cycle. Apply in no more than 0.2 inches of water per acre. For overhead sprinkler systems that are stationary, add the solution containing ROTAM METHOMYL 90SP to the irrigation water line, and apply no more than 0.2 inches of water per acre, just before the end of the irrigation cycle.

Uniform Water Distribution

The irrigation system used for application of ROTAM METHOMYL 90SP must provide for uniform distribution of ROTAM METHOMYL 90SP treated water. Non-uniform distribution might result in crop injury, lack of effectiveness or illegal pesticide residues in or on the crop being treated. Ensure the irrigation system is calibrated to uniformly distribute the chemigation application to the crop. Contact the equipment manufacturer, the local University Extension agent or other

experts if you have questions about achieving uniform distribution of the application.

Equipment Calibration

Calibrate the irrigation system and injector before applying ROTAM METHOMYL 90SP. Calibrate the injection pump while the system is running using the expected irrigation rate. If you have questions about calibration, you should contact your state extension service specialists, equipment manufacturer or other experts.

Monitoring of Chemigation Applications

A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of a responsible person, shall shut the system down and make necessary adjustments should the need arise. Wear the personal protective equipment as defined in the PPE section of the label for cleaners and repairers of application equipment when making adjustments or repairs on the chemigation system when ROTAM METHOMYL 90SP is in the irrigation water.

Required System Safety Devices

Do not connect any irrigation system used for pesticide applications to a public water system unless the pesticide label-prescribed safety devices are in place. Public water system means a system for the provision to the public of piped water for human consumption, if such a system has at least 15 service connections or regularly serves an average of at least 25 individuals at least 60 days out of the year.

1. The system must contain a functional check valve, vacuum relief valve and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.
2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
5. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
6. Systems must use a metering pump such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
7. Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, backflow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, the water from the public water system should be discharged into a reservoir tank prior to pesticide introduction. There shall be a complete physical break (air gap) between the outlet end of the fill pipe and the top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.

Posting of Areas to be Treated

Posting of areas to be chemigated is required when 1) any part of a treated area

is within 300 feet of sensitive areas such as residential areas, labor camps, businesses, daycare centers, hospitals, in-patient clinics, nursing homes, or any other public areas such as schools, parks, playgrounds, or other public facilities not including public roads, or 2) when the chemigated area is open to the public such as golf courses or retail greenhouses.

Posting must conform to all the following requirements. Treated areas shall be posted with signs at all usual points of entry and along likely routes of approach from the listed sensitive areas. When there are no usual points of entry, signs must be posted in the corners of the treated areas and in any other location affording maximum visibility to sensitive areas. The signs shall be printed in ENGLISH. Signs must be posted prior to application and must remain posted until foliage has dried and soil surface water has disappeared. Signs may remain in place indefinitely as long as they are composed of materials to prevent deterioration and maintain legibility for the duration of the posting period.

All words shall consist of letters at least 2 1/2 inches tall, and all letters and the symbol shall be a color, which sharply contrasts with their immediate background. At the top of the sign shall be the words "KEEP OUT", followed by an octagonal stop sign symbol at least 8 inches in diameter containing the word "STOP". Below the symbol shall be the words "PESTICIDE IN IRRIGATED WATER". Posting for chemigation does not replace other posting and reentry requirements for farm worker safety.

Operation

Start the water pump and sprinkler, and let the system achieve the desired pressure and speed before starting the injector. Start the injector and calibrate the injection system according to the directions above. This procedure is necessary to deliver the desired rate per acre in a uniform manner. Apply ROTAM METHOMYL 90SP in 0.1 to 0.2 inches of water per acre. When the application is finished, allow the entire irrigation and injector system to be thoroughly flushed clean before stopping the system. End guns must be turned off during the application, if they irrigate nontarget areas or if they do not provide uniform application and coverage.

It is recommended that nozzles in the immediate area of control panels, chemical supply tanks, wellheads and system safety devices be plugged to prevent contamination of these areas.

Do not apply when wind speed favors drift beyond the area intended for treatment.

Do not apply when system connections or fittings leak or when nozzles do not provide uniform distribution.

Cleaning the System

Thoroughly clean the injection system and tank of any fertilizer or chemical residues using a standard clean-out procedure. Dispose of any residues in accordance with State and Federal laws. Consult your owner's manual or your local equipment dealer for cleanout procedures for your injection system.

SPRAY DRIFT MANAGEMENT

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops. These requirements do not apply to forestry applications, public health uses or to

applications using dry formulations.

1. The distance between the outer most nozzles on the boom must not exceed 3/4 the length of the wingspan or rotor.
2. Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

Where states have more stringent regulations, they should be observed.

The applicator should be familiar with and take into account the information covered in the Aerial Drift Reduction Advisory Information

AERIAL DRIFT REDUCTION ADVISORY INFORMATION

Importance of Droplet Size

The most effective way to reduce drift potential is to apply large droplets (>150 - 200 microns). The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. The presence of sensitive species nearby, the environmental conditions, and pest pressure may affect how an applicator balances drift control and coverage. **APPLYING LARGER DROPLETS REDUCES DRIFT POTENTIAL, BUT WILL NOT PREVENT DRIFT IF APPLICATIONS ARE MADE IMPROPERLY OR UNDER UNFAVORABLE ENVIRONMENTAL CONDITIONS!** See **WIND, TEMPERATURE AND HUMIDITY**, and **TEMPERATURE INVERSIONS** sections of this label.

Controlling Droplet Size – General Techniques

- **Volume** - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- **Pressure** - Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types lower pressure produces larger droplets. Use the lower spray pressures recommended for the nozzle. Higher pressure reduces droplet size and does not improve canopy penetration. **WHEN HIGHER FLOW RATES ARE NEEDED, USE A HIGHER-CAPACITY NOZZLE INSTEAD OF INCREASING PRESSURE.**
- **Nozzle Type** - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

Controlling Droplet Size – Aircraft

- **Number of Nozzles** - Use the minimum number of nozzles that provide uniform coverage.
- **Nozzle Orientation** - Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
- **Nozzle Type** - Solid stream nozzles (such as disc and core with swirl plate removed) oriented straight back produce larger droplets than other nozzle types and the lowest drift.
 - **Boom Length** - For some use patterns, reducing the effective boom length to less than 3/4 of the wingspan or rotor length may further reduce drift without reducing swath width.
 - **Application Height** - Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.
 - **Swath Adjustment** - When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downward edges

of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.)

BOOM HEIGHT

Setting the boom at the lowest labeled height (if specified) which provides uniform coverage reduces the exposure of droplets to evaporation and wind. For ground equipment, the boom should remain level with the crop and have minimal bounce.

WIND

Drift potential is lowest between wind speeds of 3-10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 3 mph due to variable wind direction and high inversion potential. **AVOID GUSTY OR WINDLESS CONDITIONS.**

Note: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

TEMPERATURE AND HUMIDITY

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

TEMPERATURE INVERSIONS

Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain close to the ground and move laterally in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

SENSITIVE AREAS

The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from the sensitive areas).

SHIELDED SPRAYERS

Shielding the boom or individual nozzles can reduce the effects of wind. However, it is the responsibility of the applicator to verify that the shields are preventing drift and not interfering with uniform deposition of the product.

AIR ASSISTED (AIR BLAST) FIELD CROP SPRAYERS

Air assisted field crop sprayers carry droplets to the target via a downward directed air stream. Some may reduce the potential for drift, but if a sprayer is unsuitable for the application and/or set up improperly, high drift potential can

result. It is the responsibility of the applicator to determine that the sprayer is suitable for the intended application, is configured properly, and that drift is not occurring.

Note: Air assisted field sprayers can affect product performance by affecting spray coverage and canopy penetration. Consult the application equipment section of this label to determine if use of an air assisted sprayer is recommended.

AIR ASSISTED (AIR BLAST) TREE AND VINE SPRAYERS

Air assisted tree and vine sprayers carry droplets into the canopy of trees and vines via a radially or laterally directed air stream. These sprayers are not suitable for applying herbicides. In addition to the general drift management principles already described, the following specific practices will further reduce the potential for drift:

- Adjust deflectors and aiming devices so that spray is only directed into the canopy.
- Block off upward pointed nozzles when there is no overhanging canopy.
- Use only enough air volume to penetrate the canopy and provide good coverage.
- Do not allow spray to go beyond the edge of the cultivated area. Spray the outside row only from outside the planting.

CROP AND RATE CHARTS

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Alfalfa	Pea Aphid Lygus Bugs Blotch Leafminer Aphids Egyptian Alfalfa Weevil Larvae Loopers Beet Armyworm Armyworm Alfalfa Caterpillar Fall Armyworm Western Yellowstriped Armyworm Yellowstriped Armyworm	1/2 – 1	7 *	48 hrs
	Alfalfa Weevil Larvae	1		
	Variegated Cutworm	1/4 - 1		
	Do not apply to dormant or semi-dormant alfalfa when min. daily temp. is 50° F, or lower. Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. * Do not apply within 7 days of cutting or allowing livestock to graze.			
Anise (Fennel)	Cabbage Looper	1	7	48 hrs
	Beet Armyworm	1/2 - 1		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop			
Apple(Ground application only)	Apple Aphid Rosy Apple Aphid Tufted Apple Budmoth Green Fruitworm Tarnished Plant Bug	1/2 - 1 *	14	72 hrs
	Codling Moth (10-12 day spray intervals)			
	Leafrollers (Fruit-tree, Obliquebanded, Redbanded, Variegated) Lesser Appleworm White Apple Leafhopper Tentiform Leafminer Cutworm	1 *		
	Do not use on Early Macintosh & Wealthy varieties Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 5 applications per crop; minimum interval between treatments is 7 days. * Apply in a minimum of 50 gallons of water per acre.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Asparagus	Beet Armyworm, Western Yellowstriped Armyworm Asparagus Beetle Spotted Asparagus Beetle White Cutworm Redbacked Cutworm	1/2 - 1	1	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Avocado	Western Avocado Leafroller Omnivorous Looper	1/2 - 1	1	48 hrs
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Barley	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).			
Beans (Succulent) Including: Kidney, Lima, Mung, Navy, Pinto, Snap, Wax, Broad, Fava, Asparagus, Blackeyed peas Cowpeas, Chick peas, Garbanzo beans, Sweet lupine, White sweet lupine White lupine,	Leafhopper Mexican Bean Beetle	1/4 - 1	Succulent Beans 1/4 - 1/2 lb.-- 1, over 1/2 lb. - 3; 3 Vines 7 Hay	48 hrs
	Fall Armyworm Variegated Cutworm	1/2		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Grain lupine	Corn Earworm Saltmarsh Caterpillar, Yellowstriped Armyworm Western Yellowstriped Armyworm, Lygus Bugs Thrips Aphids Loopers*	1/2 – 1		
	European Corn Borer (Ovicide & Larvicide)— Initiate when moth flights first appear and-continue preventive treatments at 3-4 day intervals to control eggs and			
	Spotted Cucumber Beetle	1/4 – 1/2		
	Succulent Beans - Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. * Do not use for Loopers in AL & GA.			
Beans (Dry) (Follow Beans, Succulent)	(Follow Beans, Succulent)	(Follow Beans, Succulent)	14 - Dry Beans * 14 - Vines * 14 - Hay *	48 hrs
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting.			
Beets (Table)	Imported Cabbageworm	1/4 - 1	0 - roots 10 - tops	48 hrs
	Beet Armyworm Cabbage Looper Diamondback Moth	1/2 - 1		
	Cucumber Beetle Variegated Cutworm	1/2		
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Bermudagrass pasture	Fall Armyworm Armyworm Striped Grass Looper	1/4 - 1	7 - Forage * 3 - Dehydrated Hay **	48 hrs
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. * Do not apply within 7 days of feeding forage or allowing livestock to graze. ** Do not apply within 3 days of cutting for hay.			
Blueberries	Blueberry Leafhopper Aphids Tussock Moth Weevil Sharp-Nosed Leafhopper	1/2	3	48 hrs

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
	Cranberry Fruitworm* Cherry Fruitworm*	1/2 - 1		
	Flea Beetle (larvae) Sawfly (larvae) Blueberry Leafroller	1		
	Blueberry Maggot	1/4 - 1/2		
	Do not apply during bloom. Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than applications per crop. * For ground use only.			
Broccoli	Loopers, Diamondback Moth	1/2 - 1 **	3	48 hrs
	Imported Cabbageworm	1/4 - 1 **		
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. ** Add a wetting agent to improve coverage.			
Brussels Sprouts	Loopers Imported Cabbageworm, Diamondback Moth	1/2 - 1 **	3	48 hrs
	Variegated Cutworm	1/2 **		
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. ** Add a wetting agent to improve coverage.			
Cabbage	Loopers * Diamondback Moth Fall Armyworm	1/2 - 1 **	1	48 hrs
	Imported Cabbageworm	1/4 - 1 **		
	Variegated Cutworm	1/2 **		
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 15 applications per crop; minimum interval between treatments is 2 days. * Do not use for Loopers in AL & GA. ** Add a wetting agent to improve coverage.			
Carrot	Beet Armyworm Armyworms Aster Leafhopper	1/2 - 1	1	48 hrs
	Variegated Cutworm	1/4 - 1/2		
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Cauliflower	Imported Cabbageworm	1/4 - 1 **	3	48 hrs
	Loopers Diamondback Moth	1/2 - 1 **		
	Variegated Cutworm	1/2 **		
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. ** Add a wetting agent to improve coverage.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Celery	Beet Armyworm Aster Leafhopper	1/2 - 1	7	48 hrs
	Loopers	1		
	Variegated Cutworm	1/2		
	Armyworms	1/4 - 1		
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Chicory	Beet Armyworm Variegated Cutworm Leafhoppers	1/2 - 1	80	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Chinese Cabbage	Loopers Beet Armyworm	1/2 - 1*	10	48 hrs
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP/acre/crop. Do not make more than 10 applications/crop. * Minimum of 25 gallons water per acre by ground or 5 gallons by air.			
Collards (Fresh market only)	Diamondback Moth Variegated Cutworm	1/2	10	48 hrs
	Imported Cabbageworm Beet Armyworm Loopers*	1/2 - 1		
	Do not apply when temperature is less than 50° F. Do not apply when crop is less than 10" tall. Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop. * Do not use for Loopers in AL & GA.			
Corn (Field, Popcorn & Seed)	Earworm (Ovicide/Larvicide) Armyworm Fall Armyworm European Corn Borer- Ears 1-3 days or as needed Corn Rootworm (adult beetles) Flea Beetles Picnic Beetles Aphids	1/4 - 1/2	21- Ears 3 - Forage* 21 - Stover*	48 hrs
	Variegated Cutworm, Beet Armyworm	1/2		
	Do not apply more than 2.5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. *Corn forage is green actively growing plants that are harvested with the ears intact, then plants can be fed directly to animals or used to make silage. Corn stover are the parts of the plant that remain after removal of the grain at full plant maturity. These remaining stalks and leaves can be fed as roughage to animals.			
Corn (Sweet)	Earworm-Whorl as needed	1/3 - 1/2	0 - Ears 3 - Forage 21- Stover	48 hrs
	Fall Armyworm Armyworm Earworm,- (Ovicide/Larvicide)	1/4 - 1/2		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
	European Corn Borer- Ears 1-3 days or as needed Corn Rootworm (adult beetles) Flea Beetles Picnic Beetles Aphids			
	Variegated Cutworm Beet Armyworm	1/2		
	Certain hybrid varieties of sweet corn are susceptible to methomyl injury. Treat a small area to determine crop safety before full scale spraying. Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 28 applications per crop; minimum interval between treatments is 1 day.			
Cotton All U.S.	Ovicide/Larvicide - Bollworm, Tobacco Budworm (Initiate schedule when significant numbers of eggs are present Continue at 3 to 5-day intervals while eggs are present and larval control is adequate. If significant larvae survive, use higher rates below.) Lygus Bugs/Plant Bugs (adults and nymphs) start treatment on low level population for suppression.	1/8 - 1/4 (see Insect Predator Section)	15	72 hrs
	Cotton Leafworm	1/4 - 1/2		
	Cotton Fleahopper (as needed)	1/8 - 1/4		
	Aphids, Thrips	1/4		
East of Rockies Only	(Early Season) Bollworm, Tobacco Budworm, Beet Armyworm, Cotton Leafperforator, Fall Armyworm, Lygus Bugs/Plant Bugs (adults and nymphs) Use as occasional spray in regular schedule but not more often than every 10 days.	1/2		
East of Rockies	(Late Season)	1/2 - 3/4	15	72 hrs

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Only	Bollworm, Tobacco Budworm, Beet Armyworm, Cotton Leafperforator, Fall Armyworm, Lygus Bugs/Plant Bugs (adult and nymphs). Up to 3 applications at 3-5 day intervals after desired boll load set on plants.			
Texas	Cotton Aphid	1/4 - 2/3		
West of Rockies only	Larvicide for worms Bollworm, Fall Armyworm, Tobacco Budworm, Lygus Bugs Beet Armyworm	1/2 - 3/4		
	Cotton Leafperforator	1/3 - 3/4		
	For applications West of the Rockies, make applications on 3-5 day intervals after desired boll load set on plants. For all cotton applications: Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop . Use may redden cotton. If excessive stop or alternate with other insecticides. Do not graze or feed.			
Cucumber	Loopers Tobacco Budworm Beet Armyworm, Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickleworm Fall Armyworm	1/2 - 1	1/2 lb. — 1 Over 1/2 lb.- 3	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 12 applications per crop.			
Eggplant	Green Peach Aphid	1/4 - 1	5	48 hrs
	Tomato Pinworm (Ground Application only) Beet Armyworm Corn Earworm	1/2 - 1		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Endive, Escarole	Beet Armyworm	1/2 - 1	10	48 hrs
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Garlic	Beet Armyworm	1/2 **	7	48 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
	Do not make more than 6 applications per crop. ** Add a wetting agent to improve coverage.			
Grapefruit CA, AZ & HI only	Thrips Fruittree Leafroller Orange Tortrix Western Tussock Moth Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Grapes East of Rockies only	Grape Berry Moth (apply pre- & post- bloom & repeat at 10-14 day intervals or as needed) Leafhoppers	1/2 - 1	1 - Fresh & Raisin 14 - Wine Grapes	7 days
All U.S.	Omnivorous Leafroller, Grape Leaffolder Orange Tortrix			
West of Rockies only	Saltmarsh Caterpillar Leafhoppers*			
	Climbing Cutworm (Treat infestation and repeat at 7-14 day intervals as needed)	1		
CA only	Grape Leaf Skeletonizer*	1/2 - 1		
	Thrips	1/2 - 1		
For all applications made to grapes in the United States: Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 5 applications per crop. * Leafhoppers & Grape Leaf Skeletonizer (Ground Application Only).				
Horseradish Ground application only	Aphids Thrips	1/2	65	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application - Days To Harvest	REI
Leafy Green Vegetables: Beet (tops) Dandelions, Kale, Mustard Greens, Parsley, Swiss Chard, Turnip Greens	Beet Armyworm Cabbage Looper* Diamondback Moth Imported Cabbageworm	1/2 - 1	10	48 hrs
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop . * Do not use for Cabbage Loopers in AL & GA.			
Lemon CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Lentils	Western Yellowstriped Armyworm	1/2 - 1	21	48 hrs
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Lettuce (Head and Leaf varieties)	Alfalfa Looper	1/4 - 1	1/4-1/2 lb. - 7 over 1/2 lb. - 10	48 hrs
	Thrips Aphids Beet Armyworm Cabbage Looper Corn Earworm Aster Leafhopper	1/2 - 1		
	Variegated Cutworm	1/2		
	Lettuce (head varieties) Do not apply more than 8 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 15 applications per crop; minimum interval between treatments is 2 days. Lettuce (leaf varieties) Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop; minimum interval between treatments is 2 days.			
Melons Including: Canteloupe Casaba Santa Claus melon Crenshaw melon Honeydew melon Honey balls Persian melon Golden Pershaw melon Mango melon Pineapple melon Snake melon Watermelon	Loopers Tobacco Budworm Beet Armyworm Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickleworm Fall Armyworm	1/2 - 1	1/2 lb. – 1 over 1/2 lb. – 3	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 12 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application - Days To Harvest	REI
Mint (Peppermint, Spearmint)	Variegated Cutworm Alfalfa Looper	1	14	48 hrs
	Flea Beetles	3/4 - 1		
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Nectarine CA & AZ only	Thrips	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 3 applications per crop.			
Oats	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).			
Onions (Green & Dry Bulb)	Beet Armyworm	1/2 - 1 **	7 - Green and Dry Bulb Onions	48 hrs
	Thrips* Variegated Cutworm Black Cutworm	1 **		
	Onions, green Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop; minimum interval between treatments is 5 days. Onions, dry bulb Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop; minimum treatment interval between treatments is 5 days. *Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation to control thrips. Begin applications before thrip populations reach 3-5 thrips per plant. For best results, add a wetting agent. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. ** Add a wetting agent to improve coverage.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Oranges CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix Fruittree Leafroller Beet Armyworm Citrus Cutworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Peaches	Catfacing Insects (Plant Bugs and Stink Bugs) - begin at petal fall and continue in cover sprays at 7-to 10-day intervals Oriental Fruit Moth* -begin at petal fall; use trapping devices and frequent field inspection to determine need for treatment. Continue treatment in cover sprays and alternate with residual-type insecticides registered for this use. Green Peach Aphid	1 lb (or 1/4 lb per 100 gal up to 400 gal per acre)	4	4 days
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 6 applications per crop. * Oriental Fruit Moth (Ground Application Only).			
Peanuts	Corn Earworm* Potato Leafhopper Fall Armyworm	1/4 - 1	21	48 hrs
	Beet Armyworm	3/8 - 1		
	Green Cloverworm Velvetbean Caterpillar Cabbage Looper Soybean Looper ** Thrips Granulate Cutworm	1/2 - 1		
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop. * ROTAM METHOMYL 90SP has ovicidal and larvicidal control on corn earworm. **Soybean Looper is difficult to control. Do not apply to worms greater than 1 per 2" long. Use higher rate for severe infestations. Do not feed treated vines.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application - Days To Harvest	REI
Pears Northeast only	Green Fruitworm Oblique banded Leafroller	1/2 - 1 *	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop. * Apply in a minimum of 50 gallons of water per acre.			
Peas (succulent) Including: Pigeon peas Chick peas Garbanzo beans Dwarf peas Garden peas Green peas English Peas Field peas Edible pod peas	Alfalfa Looper Cabbage Looper* Pea Aphid Beet Armyworm Saltmarsh Caterpillar Variegated Cutworm	1/2 - 1	1 - Peas 5 - Forage 14 - Hay	48 hrs
	Alfalfa Caterpillar Armyworm Green Cloverworm	1/4 - 1		
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 6 applications per crop; minimum interval between treatments is 3 days. * Do not use for Cabbage Loopers in AL & GA.			
Pecans Southeast only	Aphids	1/2 - 1	30	48 hrs
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP/acre/crop. Do not make more than 7 applications per crop.			
Peppers Including: Bell Hot Pimentos Sweet	Loopers Beet Armyworm Green Peach Aphid Armyworm Fall Armyworm	1/2 - 1	3	48 hrs
	Variegated Cutworm	1/4 - 1/2		
	European Corn Borer	1		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			
Pomegranates	Omnivorous Leafroller	1	14	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 2 applications per crop.			
Potato	Tuberworm* Loopers Aphids Beet Armyworm Leafhoppers Fall Armyworm	1/2 - 1	6	48 hrs
	Variegated Cutworm Flea Beetles	1/2		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Potato (cont.)	<p>Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section.</p> <p>*Repeat applications of ROTAM METHOMYL 90SP on a 5-7 day schedule, or longer as needed, to control tuber worm populations. An application schedule of effective insecticides with different modes of action may be needed to keep foliar feeding larval populations as low as possible prior to harvest to reduce the risk of larval damage to the tubers. Failure to adequately control tuberworm larvae prior to crop senescence or vine kill increases the risk of tuber damage.</p>			
Rye	<p>Armyworms</p> <p>Cereal Leaf Beetle*</p> <p>Aphids**</p>	1/4 - 1/2	7	48 hrs
	<p>Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.</p> <p>Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information.</p> <p>*Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California.</p> <p>**Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).</p>			
Sorghum	Sorghum Webworm	1/2 *	14 **	48 hrs
Including: Sudangrass (Except Sweet Sorghum)	<p>Sorghum Midge --Apply when 50% bloom and 3-5 days later if needed.</p> <p>Fall Armyworm (Budworm)</p> <p>Beet Armyworm</p> <p>Corn Earworm Armyworm</p>	1/4 - 1/2 *		
	<p>Do not apply more than 1 pound of ROTAM METHOMYL 90SP per acre per crop.</p> <p>Do not make more than 2 applications per crop.</p> <p>* Minimum of 10 gallons per acre by ground or 2 gallons per acre by air.</p> <p>** Do not apply within 14 days of feeding forage or cutting for hay.</p>			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Soybeans	Green Cloverworm Velvetbean Caterpillar Mexican Bean Beetle Corn Earworm Light to Moderate infestations	1/8 - 1/4 (see Insect Predator section)	14 - Soybeans 3 - Forage 12 - Hay	48 hrs
	Moderate to severe infestations	1/4 - 1/2		
	Soybean Aphid	1/6 - 1/3		
	Beet Armyworm Salt Marsh Caterpillar Bean Leaf Beetle Fall Armyworm Thrips Silver Spotted Skipper Light to Moderate infestations	1/4 - 3/8		
	Moderate to severe infestations	3/8 - 1/2		
	Do not apply more than 1.5 pounds of ROTAM METHOMYL 0SP per acre per crop. Do not make more than 3 applications per crop.			
Spinach	Alfalfa Loopers Cabbage Looper Beet Armyworm Fall Armyworm	1/2 - 1	7	48 hrs
	Variegated Cutworm	1/2		
	Do not apply when minimum daily temperature is 32° F, or lower. Do not apply to seedlings less than 3" diameter. Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 8 applications per crop.			
Sugar Beet	Beet Webworm Flea Beetles Carrion Beetles Beet Armyworm* Aphids* Western Yellowstriped Armyworm*	1/4 - 1	30 -Tops 21 - Roots	48 hrs
	Variegated Cutworm	1/2		

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Sugar Beet (cont.)	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 10 applications per crop. *Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation to control beet armyworm, aphids and western yellowstriped armyworm. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information.			
Summer Squash* Including: Crookneck squash Straightneck squash Scallop squash Vegetable marrow Spaghetti squash Hyotan Cucuzza Hechima Chinese okra Bitter melon Balsam pear Balsam apple Chinese Cucumber	Loopers Tobacco Budworm Beet Armyworm Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickleworm Fall Armyworm	1/2 - 1	1/2 lb. -- 1 day over 1/2 lb.-- 3 days	48 hrs
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 12 applications per crop. *Fruit of the Gourd (Cucurbit accae) family that are consumed when immature, 100% of the fruit is edible cooked or raw, once picked cannot be stored, has a soft rind which is easily penetrated, and if seeds were harvested they would not germinate.			
Tangelo, Tangerine CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix, Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop.			
Tobacco (Except shade)	Flea Beetle Hornworm	1/4 - 1/2	5 - Flue cured 14 - Air or fire cured	48 hrs
	Loopers Aphids Tobacco Budworm Fall Armyworm	1/2		
	Do not apply more than 2.5 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 5 applications per crop.			

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application -Days To Harvest	REI
Tomato (Including Tomatillos*)	Tomato Fruitworm Aphids Hornworm Loopers Beet Armyworm Southern Armyworm Pinworm Armyworm Fall Armyworm	1/2 - 1	1	48 hrs
	Variegated Cutworm	1/2		
	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP per acre per crop Do not make more than 16 applications per crop. * For tomatillos do not apply more than 5 pounds of ROTAM METHOMYL 90SP per acre per crop . Do not make more than 5 applications per crop.			
Turf (For use on sod farms only)	Sod Webworm (after application, sprinkle irrigate for 15 minutes)	1 (2/5 ozs. per 1000 sq. ft.)		48 hrs
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Do not graze or feed.			
Wheat	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP per acre per crop. Do not make more than 4 applications per crop. Chemigation: ROTAM METHOMYL 90SP may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information. *Cereal leaf beetle: ROTAM METHOMYL 90SP can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California. **Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications to s on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).			

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

Pesticide Storage: Store in a tightly closed container in a cool, dry place.

Prohibitions: Do not reuse empty container.

Pesticide Disposal: Pesticide spray mixture or rinsate that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticides. Improper disposal of excess pesticide spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by the use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal: For Water Soluble Packets: Do not reuse the outer box or the resealable plastic bag. When all water-soluble packets are used, the outer packaging should be clean and may be disposed of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by open burning. If burned, stay out of smoke. If the resealable plastic bag contacts the formulated product in any way, the bag must be triple-rinsed with clean water. Add the rinsate to the spray tank and dispose of the outer wrap as described above.

For Paper and Plastic Bags: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

SPILLS: For minor spills, leaks, etc., follow all precautions indicated on this label and clean up immediately. Take special care to avoid contamination of equipment and facilities during cleanup procedures and disposal of wastes.

In the event of a major spill, fire or other emergency, call CHEMTREC, day or night, 1-800-424-9300.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Rotam Agrochemical Company Limited or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Rotam Agrochemical Company Limited and Seller harmless for any claims relating to such factors.

Rotam Agrochemical Company Limited warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Rotam Agrochemical Company Limited, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW ROTAM LTD MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the extent consistent with applicable law, Rotam Agrochemical Company Limited or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ROTAM AGROCHEMICAL COMPANY LIMITED AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ROTAM AGROCHEMICAL COMPANY LIMITED OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Rotam Agrochemical Company Limited and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of Rotam Agrochemical Company Limited.

Manufactured by:
Rotam Agrochemical Company Ltd.
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong
1-866-927-6826

Registered: [TBA]

RESTRICTED USE PESTICIDE

Due to high Acute Toxicity to Humans

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

GROUP

1A

INSECTICIDE

Rotam Methomyl 90SP Insecticide *In Water Soluble Packets*

Active Ingredient

Methomyl

(S-methyl-N-[(methylcarbamoyl)

oxy]thioacetimidate) 90%

Inert Ingredients 10%

TOTAL 100%

EPA Reg. No. 83100 – TBA

EPA Est. No.: TBA

KEEP OUT OF REACH OF CHILDREN
DANGER POISON



PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See additional Precautionary Statements on inside booklet and back panel of container and Directions For Use on inside booklet.

FIRST AID
(N-Methyl Carbamate insecticide)

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

ATROPINE IS AN ANTIDOTE. SEEK MEDICAL ATTENTION AT ONCE IN ALL CASES OF SUSPECTED POISONING.

If poisoning symptoms appear (see POISONING SYMPTOMS), get medical attention.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. FATAL IF SWALLOWED. MAY BE FATAL IF INHALED OR GETS IN EYES. DO NOT BREATHE DUST OR SPRAY MIST.

Do not get in eyes or on clothing. Wear protective eyewear and respirator. Harmful if absorbed through skin. Avoid contact with skin. Wash hands thoroughly with soap and water after handling.

POISONING SYMPTOMS: Methomyl poisoning produces effects associated with anticholinesterase activity which may include weakness, blurred vision, headache, nausea, abdominal cramps, discomfort in the chest, constriction of pupils, sweating, slow pulse, muscle tremors. If poisoning symptoms appear, refer to First Aid section on the ROTAM METHOMYL 90SP label and seek medical attention at once.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

TREATMENT: Atropine sulfate should be used for treatment. Administer repeated doses, 1.2 to 2.0 mg. intravenously every 10 to 30 minutes until full atropinization is achieved. Maintain atropinization until the patient recovers. Artificial respiration or oxygen may be necessary. Allow no further exposure to any cholinesterase inhibitor until recovery is assured.

Do not use 2-PAM for exposure to ROTAM METHOMYL 90SP alone. However, for exposure to combinations of ROTAM METHOMYL 90SP and

organophosphorous pesticides, 2-PAM may be used as required to supplement the atropine sulfate treatment. Do not use morphine.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, and mammals. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high-water mark. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area. This chemical is known to leach through soil into groundwater under certain conditions as a result of label use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

This chemical can contaminate surface water through spray drift. Under some conditions, it may also have a high potential for runoff into surface water for several days to weeks after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, and areas overlaying extremely shallow groundwater, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas over-laying tile drainage systems that drain to surface water.

PHYSICAL AND CHEMICAL HAZARDS

Keep container closed. Use with adequate ventilation.

STORAGE AND DISPOSAL

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Manufactured by:
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7/F Cheung Tat Centre
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Chai Wan, Hong Kong
1-866-927-6826

Net Contents:
Packets/Container

Registered: